

Resp Name	Organisation	Resp No.	Agent	Agent Resp No.	Rep No.	Question No. (if applicable)	Summary of rep
Main AAP Consultation Responses							
Abbas Ali	N/A	20	N/A	N/A	1	General comment	The plans for Stretford look great
Abbas Ali	N/A	20	N/A	N/A	2	General comment	Bike theft is widespread and discourages people from cycling because there is no security. A form of secure bike storage would be really helpful. The mobility scheme the Council run is manned. People could leave their bikes at an empty store with a person. The place could also provide related stuff like bike sales, accessories, maintenance classes, repairs, accessibility to bikes for those on low income.
Fiona Pudge	Sport England	28	N/A	N/A	1	General comment	Creation of high quality public realm – this objective is welcomed and supported, especially the creation of a Wellbeing Route and public spaces that link LCC and Manchester United.
Fiona Pudge	Sport England	28	N/A	N/A	2		Supporting Economic Growth – the inclusion of leisure within this objective is welcomed. However, given the presence of the two international sports stadiums, one within the AAP boundary and one just outside, the economic opportunities they can bring should be
Fiona Pudge	Sport England	28	N/A	N/A	3		Improved Permeability and Connectivity – this objective is welcomed and supported.
Fiona Pudge	Sport England	28	N/A	N/A	4		Strategic Vision – the aspiration to enhance the main arterial route as a walking and cycling corridor linking to other areas, and the potential for a new Recreation Corridor, is welcomed and supported.
Fiona Pudge	Sport England	28	N/A	N/A	5		Policy CQ1 (Civic Quarter Regeneration) - Support but suggest it can be strengthened by adding a requirement to include the principles of Active Design. Suggested wording: 'Generally accord with the principles of Active Design to promote health and well being and to encourage physical activity'. Active Design is a key principle of the GM Moving Strategy. The priorities set out in the GM Moving Plan should also be used to help inform this AAP. The inclusion of this wording would also help implement the Active Environment 'Big Issue' of Sport England's Strategy 'Uniting the Movement' (2021).

							Policy CQ1 (Parameters) - Wish to see a reduction in the height of buildings immediately adjacent to the LCC cricket ground. There is a fine turf training facility next to the ground within the car park and overshadowing from tall buildings can prejudice the use of the training facility. The height of buildings causing a prejudicial impact on the training facility as a result of a planning application on the former B&Q site has been cited as a reason for refusal (ref: 100400/OUT/20). The building heights cited in his application are between 4 and 8 storeys. It is strongly advised the AAP Team consult with the England and Wales Cricket Board (ECB) Facilities Team and the LCC to discuss what an appropriate height in this location would be. Sport England would object to this element of the AAP if the building heights parameters within the vicinity of the cricket ground are not reduced in accordance with advice from the
Fiona Pudge	Sport England	28	N/A	N/A	6		
Fiona Pudge	Sport England	28	N/A	N/A	7		Policy CQ3 (Mixed Communities) – the inclusion of refurbishing Stretford Leisure Centre is welcomed and supported.
Fiona Pudge	Sport England	28	N/A	N/A	8		CQ6 (High Quality Urban Design) - Support this policy but suggest it can be strengthened by adding a requirement to include the principles of Active Design. Suggested wording: 'Generally accord with the principles of Active Design to promote health and well being and to encourage physical activity'. Active Design is a key principle of the GM Moving Strategy. The priorities set out in the GM Moving Plan should also be used to help inform this AAP. The inclusion of this wording would also help implement the Active Environment 'Big Issue' of Sport England's Strategy 'Uniting the Movement' (2021). The third bullet point relating to taller buildings, would be inappropriate in the vicinity of the cricket ground. If the Parameters Plan associated with policy CQ1 is amended to show a lower building height around the LCC ground, then Sport England would wish to see a direct reference to that plan contained within this policy.
Fiona Pudge	Sport England	28	N/A	N/A	9		Policy CQ7 (Public Realm Principles) -- Sport England supports this policy but suggests it can be strengthened by adding a requirement to include the principles of Active Design. Suggested wording is below: 'Generally accord with the principles of Active Design to promote health and well being and to encourage physical activity'. Active Design is a key principle of the GM Moving Strategy. The priorities set out in the GM Moving Plan should also be used to help inform this AAP. The inclusion of this wording would also help implement the Active Environment 'Big Issue' of Sport England's Strategy 'Uniting the Movement' (2021).

Fiona Pudge	Sport England	28	N/A	N/A	10		Policy CQ8 (Wellbeing Route – Talbot Road) – this is welcomed and supported.
Fiona Pudge	Sport England	28	N/A	N/A	11		Policy CQ9 (Processional Route) – this is welcomed and supported.
Fiona Pudge	Sport England	28	N/A	N/A	12		Policy CQ11 (Infrastructure and Obligations) – the inclusion of sports facilities as an essential infrastructure item is welcomed and supported.
Adam Johnson	Highways England	153	N/A	N/A	1	General comment	Highways England encourages engagement with it on plans as early as possible. Highways England are committed to working with plan-making bodies prior to and between formal consultation periods for the development of strong plans and proposals that take full account of highways issues.
Adam Johnson	Highways England	153	N/A	N/A	2	General comment	Concerns raised in previous consultation that the SRN had not been considered when determining potential traffic impact of the site and whilst significant proportion of trips generated would be via non-car modes, there was the potential for significant number of new trips to access the SRN at M60 J7 or M602 J3. It was stated that further detail would be required to understand the potential number of vehicle trips which would enter or leave the SRN. This work was ongoing and it was recommended that Curtins share the results with Highways England. This was not supplied and Highways England are no nearer to understanding the impact on the M60 or M602.
Adam Johnson	Highways England	153	N/A	N/A	3	General comment	Atkins undertook a technical review of the latest Civic Quarter AAP consultation documents, which have been attached in full to this response. Based on their conclusions, Highways England make the following comments and recommendations below.
Adam Johnson	Highways England	153	N/A	N/A	4	General comment	Although not directly adjacent to the SRN, the AAP area has direct connections to M60 Junction 7 (2.6km south-west via the A56 Chester Road), and to M602 Junction 3 (2km north via the A5063 Trafford Road).
Adam Johnson	Highways England	153	N/A	N/A	5	General comment	At M60 J7, there is moderate to high traffic demand during both the AM and PM peak hours, particularly on the exit slips from the SRN onto the A56 Chester Road in the AM peak.
Adam Johnson	Highways England	153	N/A	N/A	6	General comment	There are a number of development applications across Trafford, notably Carrington Village and Partington, which cumulatively are likely to have significant impacts on the SRN in this vicinity.
Adam Johnson	Highways England	153	N/A	N/A	7	General comment	At M602 J3, there is moderate to high traffic demand during the peak hours, with a tidal flow towards / away from Manchester City Centre during the respective peak period. It is noted that congestion on the A5063 Trafford Road during the PM peak from White City Roundabout to the M602 J3 is a regular occurrence.

Adam Johnson	Highways England	153	N/A	N/A	8	General comment	There are a number of development applications across the Salford Quays and MediaCityUK area that cumulatively are likely to have significant impacts on the SRN. Additionally, the A5063 is to undergo traffic calming along its length between the junction of A5063 / Broadway and A5063 / Exchange Quay, with the aim of reducing overall vehicle delay and increase non-motorised infrastructure.
Adam Johnson	Highways England	153	N/A	N/A	9	General comment	Traffic Count Data – The traffic surveys were undertaken on a neutral day in May 2018. The peaks hours used are 08:00-09:00 and 17:00-18:00, however the raw data has not been supplied in the Transport Assessment (TA). Given the proximity of Old Trafford to Manchester City Centre, it could be the case that the peak hours are earlier than this. The peak hours should therefore be confirmed using the raw survey data.
Adam Johnson	Highways England	153	N/A	N/A	10	General comment	Traffic Growth – The traffic growth factors which have been derived from the Greater Manchester SATURN model appear to be robust in most cases. It is recommended that the 2030 morning peak factor for LGVs is increased, however this is unlikely to have a material impact on the model results. Confirmation is required in relation to the committed developments used in the forecast growth.
Adam Johnson	Highways England	153	N/A	N/A	11	General comment	Trip Rates and Generation – The adjustment factor for residential car trips results in just 16% of trips being by car in comparison to 51% from 2011 Census data. Despite the readily accessible sustainable modes in the vicinity, this seems quite low and further consideration may be required. The residential TRICS report showed the evening peak to be an hour later than the peak used in the assessment. For both residential and office, the TRICS report only contained developments which are much smaller in size than the proposed development. It is therefore a concern that the trip rates may not be representative. There has been no assessment of the redeveloped leisure facilities on trip generation, which
Adam Johnson	Highways England	153	N/A	N/A	12	General comment	Trip Distribution and Assignment – Although the comparison of the Do Minimum (DM) and Do Something (DS) shows a relatively low difference, the evening peak DS generates over 5 extra vehicles per minute which could have an impact if junctions are currently close to capacity. Traffic flow diagrams would be required to understand the number of vehicles heading to or from M60 J7 and M602 J3 as this is currently unclear. The total number of development trips in the morning peak hour is 987, and 936 in the evening peak hour. These numbers are relatively high and would likely have an impact on the SRN junctions. It is therefore crucial that the removal of existing trips is accurate to assess the true impact of the development on the surrounding network.

Adam Johnson	Highways England	153	N/A	N/A	13	General comment	Base Model – The Aimsun model does not extend to the SRN, therefore only local roads have been assessed. In the morning peak hour, the right turn from Bridgewater Way to Trafford Road has a GEH of over 10. This movement could have an impact on M602 J3 to the north. In the evening peak, another movement at the White City roundabout has a GEH over 10. As this junction links to Trafford Road and subsequently M602 J3, model validation is important in this location to determine possible impacts on the SRN. The TA identified that only 1 journey time route did not validate, however there is another route that potentially does not meet the criteria. Talbot Road northbound is 99 seconds too quick in the evening peak. If the model is too quick on this northbound route, there is potential to underestimate the impact on the M60 J7 to the south. It is suggested that the journey time validation is presented section by section as well as across the whole route.
Adam Johnson	Highways England	153	N/A	N/A	14	General comment	Forecast Model – The forecasting shows that the scheme causes some traffic to reassign from Talbot Road to the A56 Chester Road. Additionally, all journey time routes in both peaks significantly worsen with the scheme. As the assessment does not cover the SRN locations, the potential impact is unclear. To assess the impact on the SRN, the number of vehicles accessing the SRN as a result of the scheme should be made clear and, if necessary, a CD122 merge/diverge assessment should be completed. Depending on the increase seen at these junctions, detailed modelling may be required to assess the effects on capacity.
Adam Johnson	Highways England	153	N/A	N/A	15	General comment	It is acknowledged that a significant number of trips will be made using non-car methods, there is still insufficient evidence presented to enable Highways England to understand the full impact of the proposals on the SRN. Highways England would need to have an understanding of the impact further down the line at Planning Application stage. This may lead to additional pressure on individual developers when determining the forms of mitigation required for negating the traffic impact of their sites, however it is important to ensure that the safety of the SRN is not compromised, and the levels of additional traffic are minimised.
Melanie Lindsley	The Coal Authority	214	N/A	N/A	1	General comment	Records do not indicate that there are any recorded risks from coal mining legacy at surface or shallow depth within the Action Plan area. No specific comments to make in respect of the Trafford Civic Quarter Area Action Plan.

Dawn Kinrade	Natural England	219	N/A	N/A	1	General comment	Natural England does not consider that the AAP poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment. The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.
Andy Davies	Environment Agency	228	N/A	N/A	1	10. Thinking about the tests of soundness, do you consider the CQ AAP to be sound?	For matters within the remit of the Environment Agency, the AAP is in accordance with the criteria of 'soundness' detailed within paragraph 35 of the NPPF. The AAP has been informed by a comprehensive IA including a SA and SEA.
Andy Davies	Environment Agency	228	N/A	N/A	2	General comment	The strategic policies are in line with paragraph 28 of the NPPF. Although making general allocations, the AAP is not required to be informed by an updated Strategic Flood Risk Assessment (SFRA) at this stage. The AAP area is situated within Flood Zone 1 and therefore at lower risk of flooding
Andy Davies	Environment Agency	228	N/A	N/A	3	General comment	In forming the wider Trafford Development Plan an updated SFRA (further to the 2011 SFRA presented as part the CQ APP IA evidence basis) will be required for the emerging Local Plan within which the Civic Quarter area will be encompassed.
Andy Davies	Environment Agency	228	N/A	N/A	4	General comment	Development proposals within the AAP area should be assessed in line with the requirements of paragraph 163 of the NPPF and where required a site specific Flood Risk Assessment presented as part of the evidence basis.
Garry Thornton	Greater Manchester Minals and Waste Planning Unit	237	N/A	N/A	1	General comment	No further comment to add to previous comments of March 2020 (Reg 18). Again recommend that specific reference should be made within the text of Policy CQ4 to the requirement for any development proposals to adhere to the Greater Manchester Joint Waste Development Plan 2012 (GMJWDP) by ensuring the movement of waste up the waste hierarchy.
Gemma Gaskell	United Utilities	260	N/A	N/A	1	General comment	Consultation responses to earlier consultations on the Civic Quarter Masterplan in 2018 and 2020 should be read in conjunction with this response. There is some significant and complex infrastructure within the area and that will need to be afforded due regard in the construction process. The Council should be aware that complications could arise as network passes straight through these areas.

Gemma Gaskell	United Utilities	260	N/A	N/A	2	General comment	United Utilities seek to work closely with the Council during the masterplanning process. Highlight United Utilities' free pre-application service for applicants to discuss drainage strategies and water supply requirements. Contacts supplied for enquiries.
Gemma Gaskell	United Utilities	260	N/A	N/A	3	General comment	AAP should set out need to follow the hierarchy of drainage options for surface water. Public sewer is the least preferable option in NPPG. Principles should set out how redevelopment of sites achieve a significant volume reduction of surface water discharge with no surface water discharging to the existing public sewerage network. This can be achieved if early thought is given to drainage strategies. A reduction in surface water is in accordance with the non-statutory technical standards for sustainable drainage produced by DEFRA. Reducing discharge to public sewer network. will reduce the risk of sewer flooding and reduce the pressure on combined sewer overflows and therefore resulting in environmental benefits for the wider environment. It is important to explain that the existing drainage system in the area appears to be largely dominated by combined sewers. These sewers include several combined sewer overflows that are permitted by the Environment Agency. If the surface water entering the sewer network in the area is significantly reduced by discharging to more sustainable forms, it decreases the discharges from such overflow points and improve the river environment.
Gemma Gaskell	United Utilities	260	N/A	N/A	4	General comment	surface water run-off sustainably. Genuine above ground SuDS can be effectively utilised in the following instances: To drain surface water run-off from car parking, whilst making a significant improvement to the visual appearance of the car park, and providing biodiversity enhancements. United Utilities would like to see the above highlighted in Policy CQ10 'Movement and Car Parking Strategy'; Installing new and retrofitting existing public spaces with SuDS - features such as green roofs, street trees, sculpture trails, high quality public realm, landscaping proposal and walking/cycling routes all offer an alternative to directly channelling surface water through sewers or to nearby watercourses. This should be reflected in Policy CQ6 'High Quality Urban Design' and Policy CQ7 'Public Realm Principles' in the AAP. With the amount of public realm improvements proposed, surface water management should be at the forefront of the design process, and would encourage consideration is given to delivering such schemes with the aim of achieving the most sustainable outcome.

Gemma Gaskell	United Utilities	260	N/A	N/A	5	General comment	Pleased that Policy CQ4 Sustainability and Climate Change states that 'All development proposals within the AAP area should achieve the highest levels of energy and water efficiency that is practical and viable, and should maximise opportunities to incorporate sustainable design features where feasible'. Encourage design techniques like like rainwater recycling, green roofs, water butts and permeable surfaces that reduce pressure on public water supply and public sewage system along with mitigating the impact of potential flood risk both within and beyond a site boundary. Opportunity for AAP to add requirement for all new development to encourage water efficiency measures/techniques as part of the design process, whilst ensuring potential is minimised for urban diffuse pollution to affect the surrounding watercourses and water bodies. Encourage all new residential development to achieve as a minimum the optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day. Cost of installing water-efficient fittings to target a per capita consumption of 110l/d has been estimated as a one-off cost of £9 for a four bedroom house. Research undertaken for the Welsh Government indicated potential annual savings on water and energy bills for householders of £24 per year as a result of such water efficiency measures. Evidence document attached from Water Resources West to support the adoption of the Building Regulations Optional Requirement for local authorities in North West England and the Midlands.
Gemma Gaskell	United Utilities	260	N/A	N/A	6	General comment	Future developers should consider that sites may have existing infrastructure crossing through them. It will be important that any applicant produces a detailed constraints plan to inform any development layout on these sites. Development will most likely not be possible over or in close proximity to these assets, and diversion or modification to site layout may be required. It is advised that United Utilities is contacted at the earliest opportunity to discuss this.
N/A	Accrue (Forum) 1 LLP	275	WSP	389	1	General comment	Accrue Capital are the owners of the former B&Q on Great Stone Road and support the change in allocation from leisure to residential. The site is not suitable for a leisure centre or multi-storey car park. Accrue Capital welcome any dialogue with the Council regarding the redevelopment of the B&Q.
N/A	Accrue (Forum) 1 LLP	275	WSP	389	2	General comment	Welcome the aim for 4,000 homes on brownfield land. Greater clarity and consistency needed as to where these homes will be viably and realistically delivered.

N/A	Accrue (Forum) 1 LLP	275	WSP	389	3	General comment	The majority of the land identified for the 4,000 homes is in existing alternative uses, so bringing the B&Q site forward for 333 homes in the short term will help kickstart regeneration and improve the character of Great Stone Road.
N/A	Accrue (Forum) 1 LLP	275	WSP	389	4	6. Is the CQ AAP positively prepared?	The phasing of development has not been presented and so it has not been demonstrated that the AAP can deliver the quantum of homes urgently needed to address the housing shortfall within the borough
N/A	Accrue (Forum) 1 LLP	275	WSP	389	5	7. Is the CQ AAP justified?	The building height limitations are not grounded in evidence as alternative building heights and massing has not been assessed in the preparation of the AAP and the plan is unsound due to no assessment of alternatives to ensure justification based on evidence underpins the plan's policies.
N/A	Accrue (Forum) 1 LLP	275	WSP	389	6	8. Is the CQ AAP effective?	The infrastructure sum proposed is not compliant with the Regulation 122 tests and will have a huge impact on the viability and deliverability of the AAP, as well as the housing supply and delivery across the borough, with consequential economic and social impacts.
N/A	Accrue (Forum) 1 LLP	275	WSP	389	7	General comment	Do not dispute that Stretford and Old Trafford need regeneration. Support much of the AAP but object to certain elements and shortfalls that will render the plan unsound.

N/A	Accrue (Forum) 1 LLP	275	WSP	389	6. Is the CQ AAP 4 positively prepared?	<p>Support ambition to deliver 4,000 homes, though this should be confirmed as a minimum. Policy CQ2 (Housing) should specify the time period in which these homes will come forward. There are significant inconsistencies between the AAP and emerging Local Plan with regards to how the AAP will meet the area's objectively assessed needs. Draft Local Plan Policy HO1.6 states the CQ will provide around 2,700 dwellings rather than the 4,000 in the AAP. The AAP should be clear in how the area's objectively assessed needs will be met. AAP should set out a trajectory of allocated sites to demonstrate how at least 4,000 homes will be delivered. Crucial that Local Plan and AAP are consistent with each other. Object to the absence of any phasing or any allocation of homes. B&Q site can provide 333 new homes by 2024, based on the grant of planning permission in 2021. AAP and evidence base documents do not indicate the number of units apportioned for each site and so it is unclear how development will be phased and delivered. Nor has a residential appraisal of the B&Q redevelopment been undertaken. AAP should identify the following challenges: Failure to demonstrate five-year housing supply across the borough; Failure against the Housing Delivery Test (HDT) across the Borough and Measures in the HDT to deliver homes in strategic locations including the Lancashire Cricket Club Quarter. HDT Action Plan includes working with landowners on the AAP but this has been minimal. AAP risks failing to help problems of a land supply of less than three years and persistent failure to deliver the</p>
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N/A	Accrue (Forum) 1 LLP	275	WSP	389	5 7. Is the CQ AAP justified?	<p>Building Heights. Object to the building height parameters. They are not justified and could impact on the deliverability of the AAP. Disagree with the TVA (5.15) that a six storey limit to the B&Q redevelopment is due to sensitivities to neighbouring homes. TVA only tests the Council's assumptions and does not consider a range of buildings heights, therefore no evidence to justify proposed building height parameters. B&Q site can accomodate buildings taller than six storeys without impact on residential amenity, heritage assets or local character but this has not been tested. Acceptability of taller buildings heights at the B&Q site has been demonstrated for planning application for 333 homes. Documents associated with the application are provided in Appendices A-C. The Places Matter Design Panel did not agree with limit to six storey building height. Townscape and Visual Assessment (TVA)</p> <p>TVA only assess the approach set out in the AAP and does not assess any other options including alternative development heights or massing, this means the AAP should not prescribe maximum building heights. Disagree with much of paragraph 4.23 of the TVA. Old Trafford cricket ground is not unique. Event days at the cricket ground are less common than non-event days. The public spaces are the highways and the remainder of the areas is either LCCC land, B&Q site or other private land. Heritage Statement</p> <p>Agree with the list of heritage assets and welcome clarification that the non-designated asset within the cricket club is the pavillion rather than the whole ground. Agree views of the pavillion are limited to within the ground and that from Talbot Road the historic building is no longer recognisable.</p> <p>Gateway Opportunities</p>
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N/A	Accrue (Forum) 1 LLP	275	WSP	389	6	8. Is the CQ AAP effective?	<p>The following will inhibit the deliverability of the AAP: Absence of phasing and delivery of new homes; Building height parameters; and Infrastructure sum. Infrastructure sum - the principle</p> <p>Object to a fixed rate financial contribution (per sqm) imposed on all development, which cover 'area-wide' infrastructure costs secured via S106 planning obligations. The Infrastructure Sum should meet the legal tests in regulation 122 of the Community Infrastructure Regulations 2010 and Paragraph 56 of the NPPF. A fixed rate across the area requires development to fund improvements which are not necessary to make the development acceptable in planning terms and do not directly relate to the development. This levy would not satisfy the three tests. Private market homes, leisure uses and hotels in this area are already subject to CIL charging.</p> <p>Infrastructure sum - impact on viability</p> <p>The AAP's levy would treble the contributions of the proposed B&Q redevelopment and jeopardise its viability and therefore brings into question the effectiveness of this policy. The approved application for a mixed use scheme on UA92 would be seriously affected by the levy. The S106 contributions allied with the CIL will seriously undermine the viability and deliverability of the AAP with impacts upon the borough's housing supply, housing delivery and the economic and social characteristics of its community. The AAP would be unsound as it not be effective.</p> <p>Sustainable stormwater management A</p> <p>A stormwater management strategy is proposed across the AAP. The recent B&Q planning application can drain itself adequately without further intervention. This demonstrates that taking a blanket approach to infrastructure funding is not consistent with the tests for planning obligations.</p>
N/A	Accrue (Forum) 1 LLP	275	WSP	389	7	9. Is the CQ AAP consistent with national policy?	<p>The plan is not deliverable, which is inconsistent with Paragraph 35 of the NPPF and it is not based on sound evidence and assessment of reasonable alternatives. Nor is the levy consistent with the CIL Regulations and NPPF and is therefore unsound. Supportive of encouraging small scale retail users which meet local needs (Policy CQ3 Mixed Use Communities) and consider this approach for mixed use communities is consistent with NPPF policies.</p>
N/A	Accrue (Forum) 1 LLP	275	WSP	389	8	10. Thinking about the tests of soundness, do you consider the CQ AAP to be sound?	No

N/A	Accrue (Forum) 1 LLP	275	WSP	389	9	11. Based on the answer to the tests of soundness, please state clearly which page, policy, paragraph, plan or other content you are referring to in forming this view.	Policy CQ2; Parameters Plan (Page 63); Policy CQ11 Infrastructure and Obligations: Infrastructure Sum Policy CQ11 Infrastructure Obligations: Affordable Housing contribution; AAP Design Code; 4.23 of the TVA
N/A	Accrue (Forum) 1 LLP	275	WSP	389	10	12. Please state why you consider the CQ AAP to be sound/unsound, including references to relevant legislation and policies. Please reference legislation and policies for each comment.	Please refer to table 3.2
N/A	Accrue (Forum) 1 LLP	275	WSP	389	11	proposing modification(s) to make the CQ AAP sound or to strengthen its soundness?	Please refer to table 3.2
N/A	Accrue (Forum) 1 LLP	275	WSP	389	12	14. You will need to say why this modification(s) will make the CQ AAP sound/strengthen its soundness. It would be helpful if you are able to put forward your suggested revised wording for the relevant policy or text and include all information and eviden	Please refer to table 3.2

N/A	Accrue (Forum) 1 LLP	275	WSP	389	13	15. If your representation is proposing a modification(s), do you consider it necessary to participate in the Examination in Public?	Yes, we wish to participate in the Examination in Public
N/A	Accrue (Forum) 1 LLP	275	WSP	389	14	16. Reason for Attending the Examination – Soundness. Please note that participation in the Examination will be at the discretion of the appointed Inspector. If you wish to participate in the Examination, please outline why you consider this to be necessary	Accrue has a wealth of evidence and understanding of the local context that brings the deliverability of the AAP into doubt. Accrue is one of the main landowners within the AAP, owning 1ha of land that has been consistently promoted for residential development for more than four years. There remains disagreement between the Council and Accrue about the scale of development the site can withstand. It is also essential to attend the Examination to interrogate the Council's assumptions on phasing, the number of homes on each allocation and the deliverability thereof, as well as the proposed levy.
N/A	Accrue (Forum) 1 LLP	275	WSP	389	15	23. Further comments	The consultants who have prepared the Area Action Plan have mixed up some images. The photos on pages 21 and 163 are not of the consultation associated with the Civic Quarter SPD / masterplan / Area Action Plan. The photos were taken at the pre-application consultation event for the development in the grounds of UA92.
Peter Kilvert	Breathe Clean Air	279	N/A	N/A	1	General comment	Vital health issue. Ensure all premises in this area (whether domestic or commercial) do not use any wood-burning appliances.
N/A	Derwent Estates	283	Mark Aylward	284	1	General comment	Derwent Group has numerous land interests in the AAP area, comprising of 39 Talbot Road, 17-19 Talbot Road (tyre depot), 601 Chester Road (Bingo 3000), White City Retail Park. Detail in the AAP on yield of specific plots is indicative and does not preclude landowners providing their own design response.

N/A	Derwent Estates	283	Mark Aylward	284	2	General comment	It is understood weight was ascribed to the status of the document as DPD to underpin a potential requirement to take forward land assembly of specific third party plots to drive forward schemes that are both acceptable in planning terms and meet the tests set out to justify the use of s226 powers. This may now be of less relevance to the Council in the context of the B & Q site but the Council could also utilise the s226 process to simplify title which will catalyse delivery and maximise yield on some parcels which are constrained (in part) by easements and covenants. This would represent a positive use of s226 powers to accelerate Plan-led development that is acceptable in planning terms and would positively contribute to the objectives of the AAP.
N/A	Derwent Estates	283	Mark Aylward	284	3	General comment	Strongly support adjustment to extend AAP area along Talbot Road to Trafford Bar Metrolink. The inclusion of this area within the AAP boundary reduces the risk of this remaining as a poor quality zone and also secures an opportunity to deliver new development which can act positively as a gateway to the Trafford Civic Quarter.
N/A	Derwent Estates	283	Mark Aylward	284	4	General comment	The AAP area is considerable both in physical scale and its potential contribution to economic performance and housing delivery. It should be relevant in regard to the emerging Local Plan and the GMSF, as well as this AAP and any other emerging evidence base material for the Local Plan or development management processes.
N/A	Derwent Estates	283	Mark Aylward	284	5	General comment	Due to the significance and strategic nature of the Civic Quarter scheme, the AAP should be directly referenced within the GMSF. This would provide a further layer of policy support for these objectives and ensure that Trafford's ambitions will be endorsed at a sub-regional level.
N/A	Derwent Estates	283	Mark Aylward	284	6	General comment	The Civic Quarter ambitions will be fundamental to delivering Local Plan objectives including a strong contribution to housing land supply. There is some inconsistency between the anticipated yields for certain plots within the AAP area when comparing the trajectory schedules for the Local Plan and some of the yield assumptions which underpin this AAP. Inconsistencies should be addressed and rectified prior to any future Examination into either/both of the AAP or the Local Plan itself.

N/A	Derwent Estates	283	Mark Aylward	284	7	General comment	In general terms, support ambition for cohesive development in urbanised areas such as the AAP. Pragmatic decisions in these less sensitive locations provides opportunity to minimise Green Belt release. That approach is consistent with NPPF requirements, especially in regard to highly accessible locations with proximity to shops and services, employment and high-frequency public transport. Crucial to ensure delivery of development and infrastructure is achievable and viable. Opportunities to secure early development that would contribute towards housing requirements in years 1-5 of the Plan period should be afforded considerable positive weight.
N/A	Derwent Estates	283	Mark Aylward	284	8	General comment	sales values for the apartment product of circa £360-£370 for 1 and 2 bedroomed products. This appears to be a hybrid position between figures achieved in Castlefield and what has been achieved in the AAP area and/or projected through viability submissions made on behalf of developers. Paragraph 4.14 of the Viability Assessment does appear to accept that the figures achieved in Castlefield are not directly applicable as Castlefield is an established market location whilst the Civic Quarter is a new proposition. This appears to be highly optimistic and it likely that expectations of those types of return load risk on the developer and should only be applied where the profit margin (which is reflective of the risk) is increased.
N/A	Derwent Estates	283	Mark Aylward	284	9	General comment	Construction costs for apartment development feel too low especially when regard is had for the fact that the aspirations for build quality and environmental performance are substantial. Note very substantial variation in construction costs (on a unit area basis) for apartment blocks by height (say between 4 and 6 storeys) and the costs for the smaller blocks feels particularly low. This needs to be clarified more effectively by Continuum as the AAP progresses towards Examination and Derwent Group reserve the right to instruct specialist advice for the Examination.
N/A	Derwent Estates	283	Mark Aylward	284	10	General comment	In regard to other cost inputs, landowners who would submit planning applications are to commit significant resource on professional fees. The 7% professional fees budget is too low (10% is a more standard allowance other than for a very large project where economies of scale may be applicable) and the finance costs arising need to be applied over a longer period that reflects the time between Local Plan promotion to the sale of the last property.

N/A	Derwent Estates	283	Mark Aylward	284	11	General comment	A simplified singular approach to the assessment of costs and values subject to end use fails to provide necessary granularity to reach plausible outcomes. Existing use values across the AAP site are vastly different. It cannot be reasonable to assume that the "EUJ plus" assessment for a successful and well-let retail park will be the same as other parcels within the AAP area.
N/A	Derwent Estates	283	Mark Aylward	284	12	General comment	The policy should ideally be rewritten to ensure that it allows for viability testing and would not prevent otherwise acceptable and positive development from being approved and implemented.
N/A	Derwent Estates	283	Mark Aylward	284	13	General comment	Very difficult to reconcile how the Council's advisers would now argue that apartment development in this location can now sustain all of the following when they have found several apartment developments to be acceptable in recent times providing a much reduced affordable housing offer and also less in terms of the other contributions: 25% affordable housing aligned to preferred tenure mix; CIL levy; Adoption of environmental objectives; and Roof tax of £145 per sq m
N/A	Derwent Estates	283	Mark Aylward	284	14	General comment	Whilst the roof tax figure does set aside the requirement for s106 measures, this alongside the increased affordable housing offer is a step-change and it is difficult to reconcile a lack of consistency. Great risk that obligations will render otherwise acceptable development non-viable and this would be completely at odds with the clear advice of the NPPF. The AAP as a whole includes a number of environmental aspirations which need to be incorporated as part of a "policy on" calculation but also that other components (such as public realm or MSCP) which will likely generate negative returns would need to be addressed as "shared costs" or otherwise addressed through an equalisation approach. Do not accept that the proposed financial contributions are well-based in evidence and these will need to be properly justified.

N/A	Derwent Estates	283	Mark Aylward	284	15	General comment	The modelled profit margins of 17.5% for market dwellings and 6% for affordable dwellings is on the low side. This extent of new apartment development represents a considerable supply-side adjustment and there is an inherent risk in terms of market saturation and slowed sales rates and suppressed sales values. All of these components would ordinarily be addressed by a more substantive profit margin for the market accommodation. Any resultant "shortfall" from the developer's expectation of a reasonable return will be exacerbated if the social products fail to achieve the anticipated returns. There is a considerable challenge for the Registered Providers if they have to accept somewhere circa 1600 social apartments. Whilst the viability work assumes a 40% effective discount there is no obligation upon the RP to match that valuation and there is of course a risk that they would suppress their offers to give themselves a reasonable margin. The application of a highly mechanistic universal "EUV plus" and assumption that market developers and RPs will accept those low profit margins places doubt upon the Viability Assessment conclusions, specifically the realism that can be given to the aspiration to deliver 25% affordable housing and a roof tax as well as other
N/A	Derwent Estates	283	Mark Aylward	284	16	General comment	A fundamental component of the Council's approach is that the extent of surface parking across the AAP area is excessive and provides an opportunity to free up development plots. This thesis has been underpinned in part by a car park usage survey. The survey date is a Tuesday afternoon and this does not represent a peak usage period for a retail park. Given that this is designed to accommodate peak requirements, caution against review of midweek results as being a
N/A	Derwent Estates	283	Mark Aylward	284	17	General comment	Previously expresses concern with the AAP Heritage Assessment in relation to undesignated assets with specific regard to the former Old Trafford Bowling Club. . For a withdrawn application for apartment development at 39 Talbot Rd, the applicant's adviser considered the significance of that parcel and concludes that the heritage significance of that parcel is much less considerable than would be envisaged through reference to the AAP Heritage Assessment.

N/A	Derwent Estates	283	Mark Aylward	284	18	General comment	Given the AAP suggests reduced building heights by reference to heritage harm, a more pragmatic analysis would suggest that it can accommodate (some) greater height prior to resulting in material adverse impact upon that significance. Would welcome the omission of the following from the AAP Heritage Assessment: 'The Old Trafford Bowling Club is a vital connection to the leisure and sporting history of the area, as well as a site of considerable architectural and aesthetic interest. Its contribution to the heritage significance and historic character of the area is correspondingly high. The bowling green is a fundamental part of the site and makes a similarly high positive contribution. This site forms group value with the collection of other heritage assets noted on this eastern stretch of Talbot Rd within the plan area'.
N/A	Derwent Estates	283	Mark Aylward	284	19	General comment	Strongly reject the proposed Talbot Road North Conservation Area. It would not be genuinely necessary and it would fail to reflect that considerable elements of built form within that area are neither "historic" nor would genuinely be argued to provide positive contribution to local streetscene. AAP is recommending considerable redevelopment within this area it does not appear to be suggesting that a Conservation Area should be progressed in this area.
N/A	Derwent Estates	283	Mark Aylward	284	20	General comment	The listed entrance portal at White City Retail Park has been impacts through commercial development. Agree that there is an opportunity to deliver new development at White City which can provide an appropriate setting to the asset subject to well-considered new development.
N/A	Derwent Estates	283	Mark Aylward	284	21	General comment	The Neighbourhoods Plan includes boundaries to the proposed Northern Neighbourhood which includes a small part of the the Bingo 3000 plot so would therefore bisect the plot which we presume is an unintended error. It would be much preferable if the Bingo 3000 plot was entirely located within either parcel, but not to straddle both. This plan should be amended to ensure that its boundaries have regard for property interests to avoid confusion through both the Examination and later in regard to development management processes.
N/A	Derwent Estates	283	Mark Aylward	284	22	General comment	The 2020 Land Uses Parameters Plan included a frontage of retail development adjacent to ChesterRoad but was opaque how the layout might work. Welcome that Policy CQ1 recognises that this is one possible way forward. There are reservations as to whether it is achievable or desirable. There will inevitably be design solutions through which White City can support residential redevelopment and town centre uses. As drawn, cannot support this as it would result in layouts (re servicing requirements) that would be unacceptable to end occupiers and impede the gateways given to Talbot Rd or Chester Rd in due course.

N/A	Derwent Estates	283	Mark Aylward	284	23	General comment	Clear Building Height Parameters. This is a somewhat historic plan that does not appear to align with more recent developed drawings and schedules in terms of building heights and notional yields which can be achieved. there appears to be considerable inconsistency in terms of what might be recommended or potentially modelled heights and yields for these development parcels. It will clearly be much preferable if these approaches were internally consistent. If there is a premise why the Masterplan should suggest different heights for the same parcel of land in the prism of a specific analysis, this should be expressly addressed and the overall recommendation should be clear. In its current form and without proper context, suggest that this parameters plan is either deleted or is highlighted as being simply a representation of one possible way
N/A	Derwent Estates	283	Mark Aylward	284	24	General comment	Derwent is supportive of the principle of this wider redevelopment but any substantive remodelling of the retail park area can only come forward following detailed design and viability analysis. As drawn, the permeability analysis for the wider scheme does appear to assume key routes through the retail park and it has to be anticipated that the White City redevelopment might well be undertaken on a phased basis so it may be necessary and advisable to have the capacity for an interim approach. White City (following investment) is a successful retail park which has to have regard for the safe servicing requirements of its tenants. This must be integral to the consideration of how phased redevelopment is implemented in practice.
N/A	Derwent Estates	283	Mark Aylward	284	25	General comment	Policy CQ1 advises the parameter plans are illustrative. Given that they are illustrative and there are deliverability challenges, parameter plans should be omitted. If they were given weight in decision making, the policy could prejudice the implementation of developments that would otherwise be acceptable prior to any demonstration that the redevelopment anticipated by the AAP is genuinely deliverable. This is important given that the policy puts the onus on the applicant to demonstrate their proposals would not materially impact upon the AAP objectives. In the context of White City Retail Park, Derwent supports the ambition but any redevelopment decision requires considerable market testing and that there is potential that may such redevelopment would be phased. Rectify that AAP does not consider phasing or interim uses. Amend policy to expressly recognise need for pragmatism in terms of

N/A	Derwent Estates	283	Mark Aylward	284	26	General comment	Policy CQ2. AAP aspirations for 25% affordable housing on site, CIL levy plus a roof tax which would capture all of the typical obligations with the exception of affordable housing and CIL. Viability analysis should undertake a 'policy on' assessment of the viability implications of these requirements as well as developments costs and existing use value. Concerns that the approach is too simplistic and will considerably underestimate existing use value and over-estimate what new development can sustain in terms of affordable housing and roof tax levies. If obligations are over-estimated, considerable risk that quantum of new homes envisaged will not be delivered in early part of the plan period without having to challenge the viability assumptions at DM stage which would be unhelpful to all stakeholders.
N/A	Derwent Estates	283	Mark Aylward	284	27	General comment	Policy CQ3. The site includes a major retail park serving range of local needs and not reasonably described as 'small scale'. Revise policy to refer to localised needs or F2 Use Class. If White City Retail Park was redeveloped and any retail would fall within Use Class F2, that would not allow a store akin to Tesco Express which would fail to meet shopping needs and push residents to drive further afield. It would likely create pressure for further out-of-centre retail development to replace existing facilities that provide fresh food. Replacement stores might be located further away from housing, economic activity and public transport. Not feasible that a local needs store can cater for 4000 homes, so they will be compelled to use private car. This element of CQ3 needs to be fundamentally reconsidered, also because it will cause conflict with the ambitions and intent of Policy CQ4.
N/A	Derwent Estates	283	Mark Aylward	284	28	General comment	Support general principles of Policy CQ4 but expect that through the Examination that the "policy on" implications of this and all policies have been properly tested. If CQ3 is not amended, the prospect of compliance falls away. The Examination should rigorously test that the "policy on" implications have been assessed and consider how to proceed if there is any resultant doubt re the deliverability of viable development across the Plan period.
N/A	Derwent Estates	283	Mark Aylward	284	29	General comment	Broadly supportive of aspirations stated by Policy CQ5. Conclusions in Heritage Assessment on significance of existing buildings and structures to the east of AAP area are poorly judged. Heritage Assessment suggests a Conservation Area that is not expressed in CQ5, the AAP should confirm that it does not seek to take forward any such approach. If those proposals were not amended, Derwent would strongly object.

N/A	Derwent Estates	283	Mark Aylward	284	30	General comment	Policy CQ10 refers to ambition for concentration of parking upon White City Retail Park, infer that this would be a multi-storey car park. Whilst achievable in principle, it would need to be subject of detailed design and viability analysis considered in detail. If the viability was below a reasonable level, the Council should consider how redevelopment of White City might need to be reviewed in the light of any planning benefits of a multi-storey car park as compared to other planning objectives in AAP or as part of a broader equalisation approach. This requires further consideration and needs to be inputted into to viability framework.
N/A	Derwent Estates	283	Mark Aylward	284	31	General comment	Policy CQ11. Welcome general approach to simplify the calculation for infrastructure and developer contributions but it over-simplifies the approach because of vastly different use values across AAP area. Not reasonable to assume that the EUV plus assessment for a successful retail park will be the same as other parcels. Rewrite policy to allow for viability testing and do not prevent otherwise acceptable development from being implemented. Environmental aspirations in AAP need to be incorporated as part of a 'policy on' calculation and other components such as public realm or multi storey car park which would likely generate negative returns would need to be addressed as 'shared costs' or otherwise addressed through an equalisation approach. Proposed financial contributions are not well-based in evidence and these will need
N/A	Derwent Estates	283	Mark Aylward	284	32	General comment	Central Neighbourhood. Supportive in principle of proposed redevelopment of White City Retail Park. Welcome bringing forward substantive mixed-use development in eastern part of retail park. This includes a range of blocks of varying height including the tallest element on the north-eastern boundary to act as a landmark and gatepost to the CQ area. The intensification of the Talbot Road corridor would provide an opportunity for linked trips to the Retail Park but that these will be mitigated by the current layout which makes north/south pedestrian movements difficult. Any full redevelopment decision requires considerable market testing and that there is potential that may such redevelopment would need to be phased. The AAP should be amended to expressly recognise that phased delivery is likely and that there would be a need for a pragmatic approach to support 'meanwhile uses'.
N/A	Derwent Estates	283	Mark Aylward	284	33	General comment	Derwent is keen to engage with the Council and encourages iterative dialogue so that we can contribute to the Masterplan's key objectives and to optimise the opportunity for their realisation. This should include for the opportunity for a substantive landmark residential-led development within the eastern quadrant of the retail park, which could enhance pedestrian linkage to and through the site from the Talbot Road corridor.

N/A	Derwent Estates	283	Mark Aylward	284	34	General comment	Concerns with the proposed layout and maximum heights in north-eastern part of the site. It is one design solution and would be unduly prescriptive if applied in blanket fashion. The economics of this type of accommodation vary very widely, so it will be important to accommodate some design development or risk impact upon the ability of the development to deliver social infrastructure including affordable housing.
N/A	Derwent Estates	283	Mark Aylward	284	35	General comment	Concerns with multi storey car park solutions from a viability perspective. In addition, the development would be on a phased basis. This is unlikely to be described as "small scale" so there will be a need to understand that the layout will need to accommodate that and those servicing
N/A	Derwent Estates	283	Mark Aylward	284	36	General comment	The Bingo 3000 site provides an opportunity for a landmark building (or buildings) delivering considerable yield and significant redevelopment in a key location prominent to two primary axes. This is readily available for development in the early part of the Plan period.
N/A	Derwent Estates	283	Mark Aylward	284	37	General comment	Eastern Neighbourhood. Derwent is supportive in principle of the inclusion of this area within the AAP, recognising that it can provide real contribution to AAP objectives and support positive development on this
N/A	Derwent Estates	283	Mark Aylward	284	38	General comment	Non-designated buildings have been given excessive significance and the Heritage Assessment suggests a Conservation Area which is not justified. Welcome the AAP does not take forward this suggestion but it does suggest a lower height for the plot adjacent to the Bowling Club which we suggest could straightforwardly accommodate 6-8 storeys which would also align with the indicative yield which is mooted through the Regulation 18 Local Plan.
N/A	Derwent Estates	283	Mark Aylward	284	39	General comment	Support approach that site to the east of Trafford Public Hall used as a tyre depot can support residential apartments of up to 10 storeys. This can come forward quickly and contribute to housing land supply in years 1-5 of the Plan period, subject to viability testing and ensuring that the CQ11 framework is realistic and will not impede development coming
N/A	Derwent Estates	283	Mark Aylward	284	40	General comment	Hope that the proposed maximum heights for block developments (such as 39 Talbot Road and White City Retail Park) will be utilized as broad guidance rather than a set of absolute standards. The block layout and form does not necessarily align with market signals, and this could impact upon deliverability and the opportunity to secure social infrastructure such as much needed affordable housing.
Emily Hycran	Historic England	292	N/A	N/A	1	General comment	No comments to make on the document at this stage.
Nicola Elsworth	Homes England	293	N/A	N/A	1	General comment	Homes England does not wish to make any representations on the Civic Quarter Area Action Plan Consultation.

Charles Bainbridge	N/A	379	N/A	N/A	1	General comment	Would like to see more bars, cafés, restaurants and independent shops. It would make a lot of money for the local community. The areas needs to be a destination for a weekend drink and food, not just for sporting
Charles Bainbridge	N/A	379	N/A	N/A	2	General comment	Would like more green spaces. Car parks could be turned into green areas with a push on people using public transport. The open spaces could have water features.
Charles Bainbridge	N/A	379	N/A	N/A	3	General comment	Looking forward to having a new leisure centre. Sauna/steam room facilities would be great.
Charles Bainbridge	N/A	379	N/A	N/A	4	General comment	Proposals for a new large hotel with a rooftop bar would be a great addition and attract tourists to stay in the areas. Getting lots of tourists would make the area thrive.
Graham Cooper	N/A	396	N/A	N/A	1	General comment	Agree with all of the proposals.
Graham Cooper	N/A	396	N/A	N/A	2	General comment	There is a single reference to improving the experience of arriving at Old Trafford Metrolink stop but it is not in the relevant appendix. A large number of people arrive at Old Trafford Metrolink stop, they find it very basic and inhospitable and they do not know the direction to MUFC. The signage is not prominent. Improvements should include something very prominent like a triumphal arch with 'Welcome to Old Trafford' leading from the Metrolink stop to Brian Statham Way. Give the impresssion people are arriving somewhere important and welcoming.
Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	1	General comment	Heritage Assessment is welcomed. The AAP offers a significant opportunity to facilitate the development of Old Trafford with this incredible legacy. Fully support the inclusion of heritage as one of the key themes and welcome the identification of a number of non-designated heritage assets inside the boundary.
Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	2	General comment	The document recognises the sporting and cultural heritage of Old Trafford and and the contribution it could make to the regeneration and place shaping. The history of Manchester Botanical Gardens and subsequent amusment park is not carried through sufficiently in the proposed layout of individual neighbourhoods nor the potential for archaeology or heritage interpretation. The blue prints of White City should be included in the assessment and this layout could have influenced the northern area of the central neighbourhood. Reflect unique history of the area reflected/interpreted in the layout of buildings, height parameters, landscaping, public space, materials and artwork/interpretation. This should also be reflected in Policy CQ5.

Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	3	General comment	The significance of LCCC is noted in the document and in particular the reference to the ground. This should be included as part of the NDHA with the exception of the stands.
Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	4	General comment	The assessment also includes the significance of the Police Station, this should also be identified as a NDHA.
Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	5	General comment	The setting of Trafford Town Hall, GII & Entrance portal and lodges to White City GII [White City Gates] needs to be expanded.
Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	6	General comment	An analysis of views of all the designated and non-designated heritage assets should be included in the HA. In particular further analysis of Trafford Town Hall. There are key views of the clock tower along Brian Statham Way from the south east; across the car park at LCCC and from the north west along Warwick Road. There are also views outside the AAP along Chester Road and the junction of Talbot Road & Chester Road. Key views should be identified to ensure they are sufficiently
Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	7	General comment	There is no recognition of the former Warwick Road Station, now Metrolink, and the contribution this has made. The former railways station lies on the boundary of the AAP and redundant platforms are within the boundary. The existing platforms afford views of TTH.
Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	8	General comment	General concerns about proposed height parameters. Whilst there is scope to increase heights in the area, up to 20 storeys is exceptionally tall. It is not clear how this will preserve the area's unique characteristics when the majority of heritage assets identified are two storeys nor integrate the fragmented townscape. Buildings of this height on Talbot Road will impact on TTH. A more sensitive scale such as 3 storeys would be welcomed in certain areas. In particular along Talbot Road & Warwick Road and also adjacent to White City Gates. There is also a significant jump from 20 storeys to 6 along Talbot Road and this should be more gradual. Not clear what a gateway opportunity is and how this will impact on heritage assets such as Trafford Bar, Trafford Hall Hotel and White City Gates. The heights proposed adjacent to White City Gates are also a

Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	9	General comment	Entrance portal and lodges to White City Gates are in poor condition. The structure requires remedial work and some restoration of lost architectural features. This and need for enhancement should be recognised by the AAP.
Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	10	General comment	A series of blocks up to 12 storeys behind White City Gates with public realm to the west is a missed opportunity. The public realm should form the setting to the Grade II listed structure referencing the former pleasure grounds and linking through to Talbot Road. The proposed height of up to 20 storeys will have an impact on White City Gates and a more sensitive scale should be sought surrounding the Grade II listed structure and public realm.
Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	11	General comment	Proposed block in front of UA92 and the up to 20 storey block on Talbot Road will have most impact on openness and the contribution this area makes to the setting of Trafford Town Hall. The proposed up to 20 storeys appears excessive. The existing Oakland House is 15 storeys and there is scope to reflect this. Potentially buildings of this height could impact on Old Trafford Bowling Club. Existing design principles along Talbot Road needs greater recognition these include the set back and depth of buildings, spaciousness between blocks, grass verges, street trees, soft landscaping such as hedging.
Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	12	General comment	The Old Trafford Bowling Club is a fascinating remnant of sporting heritage. The adjacent proposed height parameters should be reduced to adequately respond to non-designated heritage assets such as Trafford Bar, Trafford Hall Hotel and the OT Bowling Club. The bowling green is orientated to receive the afternoon sun; concerned that the proposed height parameters along Talbot Road could impact on this important aspect of the design.
Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	14	General comment	Design Code. The AAP should encourage interesting silhouettes and varied rooflines to tall buildings; a good quality palate of materials; well articulated buildings with detailed principal elevations and active frontages at street level. A specific design codes for tall buildings would be welcomed and for each neighbourhood.
Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	15	General comment	The current set back & depth to buildings along Talbot Road should be recognised and also include the importance of spaciousness between blocks, grass verges, street trees and hedging which all add to the quality of the street and should be retained and incorporated into the design code for elsewhere in the AAP. The setback in particular has helped reduce the prominence of existing tall buildings along Talbot Road. This is not sufficiently included in the design code or public realm principles.

Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	16	General comment	The processional route to MUFC should be included in the AAP boundary to link the two sporting grounds.
Elisabeth Lewis	Heritage Development Officer, Trafford Council	401	N/A	N/A	13	General comment	TVIA doesn't take account of kinetic views. Views identified do not take account of all heritage assets identified in AAP nor includes heritage assets potentially affected outside the boundary such as Longford Park CA; Empress Conservation Area or Gorse Hill Park including associated group of listed structures. A greater analysis of TTH or White City Gates is required.
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	1	General comment	Planning permission has been sought for demolition of the existing office building at and erection of a hotel at 701 Chester Road. Permission was refused and went to appeal. The Inspector considered the main issues of the proposal. The appeal decision and the Local Planning Authority's own analysis conclude that there are no other issues requiring resolution, including the principle of a hotel.
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	2	General comment	The site is located in Core Strategy Strategic Location 3 Lancashire Cricket Club Quarter, the AAP and the proposal would implement its ambition for a major mixed use development. Core Strategy Policy R6 lists the Strategic Location as an area where culture and tourism will be supported. The proposal is located on a key route and creates a landmark between public transport facilities and visitor attractions. Policy R2 seeks to encourage increase in hotel provision. Present policy supports this land use in this part of the borough. Providing site specific issues can be met and no objections raised to the principle of a hotel, this proposal is acceptable. A hotel in this location will reduce transport demand. Although the site is outside of a town centre, it is within the hinterland of the Trafford and Salford visitor attractions where a hotel would be expected and meet demand.
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	3	General comment	The AAP proposes: 701 Chester Road is a gateway and landmark development at a strategic location; Pages 47 & 49 identifies the site and adjacent Chester Road sites as 'Negative impact buildings on under-utilised sites' and the opportunity is noted as 'There is both a need and opportunity to better define places and urban grain in the area, including opportunities for gateway buildings to arterial routes, improved transport hubs and new neighbourhoods', this is consistent with our hotel proposal; Policy CQ3 encourages 'Hotels/aparthotel accommodation to meet market demand'; The AAP and Transport Assessment notes an over-provision of parking, the area is dominated by car parking and it detracts

Brian Madge	Acre Manchester Ltd	408	N/A	N/A	4	General comment	The site has a gateway function as being a market between the two sports facilities. It is at a key junction where Warwick Road is used by many sports fans. The site has the opportunity to reflect this cornerstone quality and become a gateway building towards the city centre. A taller building allows greater space to be allocated to the public realm making it better able to deal with large crowds. A taller building would be a landmark celebrating this key junction and potential public space. Support the proposal for a landmark building. The Inspector at the Appeal found 16/17 storeys too oppressive but the Local Authority have promoted a nearby building of 12 storeys on P63. The parameter plans note our part of the locality is "Predominantly residential" but has a goal of up to 12 storeys. The preceding pages note "The following parameter plans form part of this policy. The other landscape, masterplans and massing diagrams contained in this document are illustrative only and have not been tested against the policies of the AAP or other development plan policies. They should not be treated as a template to guide planning applications". Given this is an opportunity site this ambiguity is not helpful. Suggest the AAP could provide greater clarity.
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	5	General comment	Support the recognition that a hotel is an appropriate use for the locality subject to market conditions. The proposal will implement the vision, particularly 'providing a unique and attractive destination for the wider community, residents, businesses and visitors alike'.
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	6	General comment	NPPF supports reduction in parking to reduce congestion and increase development densities. In April 2019 Trafford's review of Local Development Plan policies concluded that parking standards in local policy are out of date and have little weight. Note the proposal to downgrade Warwick Road and to enhance it as a processional route. The findings of the parking study undertaken by Curtins suggest an overprovision of car parking. Support the proposal to relax parking standards with a greater focus on more sustainable modes of transport. The site has a GMAL score of 7, which is classified as a very high level of accessibility. GMAL scores of 7 and 8 are typically found in city centres in areas with the best levels of accessibility in Greater Manchester.
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	7	General comment	The Chester Road junction is identified for an "Improved supercrossing at gateway" (Page 117). This has the possible potential to impact on the design of the building. It would assist if a schematic plan could be

Brian Madge	Acre Manchester Ltd	408	N/A	N/A	8	General comment	On Page 35 the plan identifies Hornby Road (and other nearby roads) as a 'Non-designated heritage asset'. We recognise that these buildings represent a past era but they are also undistinguished and there is a possible conflict with other policies promoting development with a landmark building up to 12 storeys.
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	9	General comment	Policy CQ11: Infrastructure and Obligations is a new provision but appears not well related to specific infrastructure projects and in this respect may conflict with CIL. The provision should be specifically related to costed projects
Brian Madge	Acre Manchester Ltd	408	N/A	N/A	10	General comment	The draft AAP is sound at this stage and is generally supported but greater clarification as detailed in this submission would assist the development process.
Charlotte Sargeant	N/A	410	N/A	N/A	1	6. Is the CQ AAP positively prepared?	No
Charlotte Sargeant	N/A	410	N/A	N/A	2	7. Is the CQ AAP justified?	No
Charlotte Sargeant	N/A	410	N/A	N/A	3	8. Is the CQ AAP effective?	No
Charlotte Sargeant	N/A	410	N/A	N/A	4	9. Is the CQ AAP consistent with national policy?	No
Charlotte Sargeant	N/A	410	N/A	N/A	5	10. Thinking about the tests of soundness, do you consider the CQ AAP to be sound?	Unsound
Charlotte Sargeant	N/A	410	N/A	N/A	6	General comment	This is not a questionnaire for residents , it is too technical for the locals. No questions about the plans themselves for residents. It seems there is no way for residents to participate.
Charlotte Sargeant	N/A	410	N/A	N/A	7	General comment	Type face on AAP is too small and faint form most people and this is probably deliberate so that people cannot make sound comments.
Charlotte Sargeant	N/A	410	N/A	N/A	8	General comment	Make a smaller document and send to residents to read and comment on. Go house to house to talk to residents of Hornby Road and Barlow Road
Charlotte Sargeant	N/A	410	N/A	N/A	9	General comment	Do not want Hornby Road to be a processional route or the road opening at the other end as it is a cul de sac.
Charlotte Sargeant	N/A	410	N/A	N/A	10	General comment	The document does not say what is proposed for Hornby Road and Barlow Road.

Charlotte Sargeant	N/A	410	N/A	N/A	9	17. Do you consider the CQ AAP to have met/not met the requirement of the Duty to Cooperate in accordance with Section 110 of the Localism Act 2011 and Section 33A of the Planning and Compulsory Purchase Act 2004?	Not met
Charlotte Sargeant	N/A	410	N/A	N/A	11	19. Independent Examination – Duty to Cooperate. In regards to the Duty to Cooperate, do you consider it necessary to participate in the Examination in Public?	No
Charlotte Sargeant	N/A	410	N/A	N/A	12	21. With reference to the updates to the Integrated Assessment process, do you consider the assessment undertaken to be adequate?	No
Charlotte Sargeant	N/A	410	N/A	N/A	13	General comment	Everything has changed since Covid and office space is no longer needed.
Charlotte Sargeant	N/A	410	N/A	N/A	14	General comment	What does the green arrow going up Hornby Road mean? Does it mean to open the road at one end for pedestrians?
Charlotte Sargeant	N/A	410	N/A	N/A	15	General comment	Tidying up the area, buildings demolished or built on would improve the area.
Charlotte Sargeant	N/A	410	N/A	N/A	16	General comment	It is a disgrace that Barlow Road has not been resurfaced for about 20 years. Improvements are for the experience of match days and not for the residents.

Charlotte Sargeant	N/A	410	N/A	N/A	17	General comment	Big sporting events cause a headache for residents. The roads don't get closed and everyone arrives in an Uber. Marathons mean not being able to get out for hours and there is no offer of alternative parking on those
Charlotte Sargeant	N/A	410	N/A	N/A	18	General comment	Support making the placier and green spaces
Charlotte Sargeant	N/A	410	N/A	N/A	19	General comment	No to tall buildings
Charlotte Sargeant	N/A	410	N/A	N/A	20	General comment	The green arrow/line reflecting aspirations to facilitate better pedestrian movement and connectivity will increase crime and litter from visitors and make it harder for resident to access their road.
Debbie Marshall	N/A	411	N/A	N/A	1	General comment	Concerned about the processional route from the cricket ground to the football ground. Question on how residents from Horny Road and Barlow Road drive onto street.
Joshua Montegrande	N/A	412	N/A	N/A	1	General comment	The area would greatly benefit from having the latest fibre optic broadband capabilities. At the moment, only subpar internet is available for residents and businesses here. Is this something that can be seriously considered and hopefully implemented? It would improve home working.
Jacob Jumani	Jumani Holdings	413	N/A	N/A	1	General comment	Jumani Holdings (JH) has interest in land within AAP boundary covering two sites at the former MKM House on Warwick Road and Charlton House which is located fronting Warwick Road, Chester Road, and Montague Road. JH has proceeded to implement planning permission at Former MKM House Site. There are design challenges with its delivery and a new scheme has been submitted to make the scheme a quality placemaking opportunity. JH is in the process of acquiring Chorlton House site from current owners and discussions are oning with Trafford Council regarding redevelopment principles.
Jacob Jumani	Jumani Holdings	413	N/A	N/A	2	General comment	Designation of MKM Housing site as an 'Area to be Developed' is supported. Although question identifying The Trafford pub as a non-designated heritage asset and the value that should be attributed to its retention given it is infrequently open and does not offer much to this important gateway into the AAP area.
Jacob Jumani	Jumani Holdings	413	N/A	N/A	3	General comment	Generally support the vision to create a mixed-use neighbourhood. The proposed illustrative masterplan (IMP) does identify one form of potential new development on the site in question, although it is acknowledged that these are not yet based on sound detailed design principles.

Jacob Jumani	Jumani Holdings	413	N/A	N/A	4	General comment	Policy CQ1 (Section 4.1.1). Note that the three urban strategy diagrams set out key strategies for the future development of the two sites, including: Predominantly C uses (residential); Improved permeability with a new tertiary connecting route shown through the Charlton House site; A massing language that seeks to strengthen Chester Road with a potential courtyard shown on the Charlton House site; and Clear height parameters of up to 12 storeys covering both sites. Support these broad objectives, redevelopment of both sites can help deliver these. But have comments on the above height.
Jacob Jumani	Jumani Holdings	413	N/A	N/A	5	General comment	Central Regeneration (pages 10 & 11) support adaptation for denser urban grain and use of vacant sites but have issues with the illustrative masterplan image. It depicts a form of development on the former MKM House site that bears no resemblance to the consented scheme. The illustrative material should reflect the implemented scheme or the newly submitted scheme throughout the document that was submitted in September 2020.
Jacob Jumani	Jumani Holdings	413	N/A	N/A	6	General comment	The illustrative masterplan image shows the redevelopment of Chortlon House as significantly below the 12 storey parameter height, which is not deliverable. This material should be consistent and portray the correct message. A taller scheme should be included in the illustrative masterplan, at least up to the 12 storey datum if not taller to represent a Landmark Building.
Jacob Jumani	Jumani Holdings	413	N/A	N/A	7	General comment	Do not agree with the illustrative masterplan that proposes development at MKM House that is significantly lower than the now implemented planning permission for a 12 storey building albeit is also lower than the submitted planning application for a 13 storey building.
Jacob Jumani	Jumani Holdings	413	N/A	N/A	8	General comment	It is a significant missed opportunity not to identify the Charlton House site a "Proposed Landmark Building" given its location at arguably the most important Major Gateway in the AAP area. This will be a prominent development on Chester Road and the new Processional Route and has the potential to be a high quality building marking the Civic Quarter from Chester Road.
Jacob Jumani	Jumani Holdings	413	N/A	N/A	9	General comment	Acknowledge the new green route proposed that could be provided as part of the Charlton House redevelopment.

Jacob Jumani	Jumani Holdings	413	N/A	N/A	10	General comment	Regarding height parameters for Former MKM House, it is acknowledged that the site sits within an area indicated for buildings up to 12 storeys, which reflects the implemented consent and is supported. As part of the newly submitted scheme being discussed with officers it does need to take into account to include an additional storey over and above the 12 storeys to help make the scheme deliverable. Given the scale of the existing Warwickgate House it is felt that, subject to an acceptable design solution, an additional storey could be supported and, therefore, it is requested that the language of the AAP is clear that there may be potential to explore heights above the stated guidelines in certain
Jacob Jumani	Jumani Holdings	413	N/A	N/A	11	General comment	Regarding height parameters for Chorlton House, this site sits at the strategically important junction of Warwick Road and Chester Road, being a key and visible gateway into the Civic Quarter for people going to and from the sports grounds or travelling into Manchester. The existing building is already tall but is currently derelict and an eyesore.
Jacob Jumani	Jumani Holdings	413	N/A	N/A	12	General comment	Do not necessarily challenge maximum of 12 storeys to the north of Warwick Road in the Central Neighbourhood. However, the AAP recognises that elsewhere sites in key locations can have additional height as 'Gateway Opportunities'. It is significant missed opportunity not to recognise Chorlton House as such. The other identified 'Gateway Opportunities' have the relationship to the new Processional Route. Its location adjacent to The Trafford pub should not prevent it being made a non-designated heritage asset, given other such designations are also next to heritage assets. Strongly consider designating the building as a 'Gateway Opportunity', it would set a context for exploring the most appropriate height and design further with officers to ensure this important site can fulfil its true potential. JH are extremely keen to work collaboratively with the Council in bringing forward a high quality
Jacob Jumani	Jumani Holdings	413	N/A	N/A	13	General comment	Given the detailed discussions on the current new planning application, there are concerns around the methodology and assumptions underpinning the viability and affordable housing targets which can somewhat make future developments of a challenge to achieve in the
Jacob Jumani	Jumani Holdings	413	N/A	N/A	14	General comment	Support the broad ambitions for the area and the JH sites can make a significant contribution to their delivery and meeting strategic growth objectives. Hoped the improvements as set out can be incorporated. JH would welcome further dialogue with Trafford Council and key stakeholders prior to the SRF AAP being finalised to ensure that its comments can be addressed.

N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	1	General comment	Lancashire County Cricket Club (LCCC) has engaged with the Council on its aspirations for the cricket ground during the formulation of the Civic Quarter Masterplan and the AAP. As part of these discussions, it was LCCC's understanding that the vision for the area covered by the Southern Neighbourhood was the creation of a leisure quarter with the promotion of the cricket ground together with enhanced/additional leisure facilities. This vision included strengthening the role of the cricket ground, replacing the outdated LCCC training facilities as part of combined new leisure facility, additional multistorey car park on the former B&Q site with other leisure uses to compensate for loss of parking, enhancing the visitor experience to the cricket ground with processional route on Brian Stham Way together with enhancement of areas round the cricket ground. LCCC has always made clear that the creation of a permanent public square on an area of LCCC's car parking would not be acceptable. LCCC's understanding was that significant progress had been made with the Council in setting that vision and was fully expecting it to be incorporated/reflected in the current version of the AAP. LCCC is particularly disappointed that this is not the case. The vision is a clear departure from the vision promoted by the Council in partnership with the LCCC. That calls into question the deliverability of the AAP and Southern Neighbourhood. The AAP for that reason cannot be regarded as effective in accordance with the tests of soundness.
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	2	General comment	The AAP throws out the outcome of a partnership approach to the Southern Neighbourhood which fairly represented not only an analysis of community needs but their alignment with spatial planning to guide public and private investment decisions.
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	3	General comment	Ambition to create new leisure community facility linked with other accets including LCCC has been lost because short term investment priorities have been impacted by the present health crisis. The AAP covers the area through to 2037 and beyond, the availability of resources should determine the pace at which the vision for the area is delivered not the essence of the vision itself when it is the right vision for the area. There are a range of public funding programmes available which can assist in the delivery of the leisure facility, such as the levelling up fund.
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	4	General comment	The vision is a clear departure from the vision promoted by the Council in partnership with the LCCC. That calls into question the deliverability of the AAP and Southern Neighbourhood. The AAP cannot be

N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	5 12. Please state why you consider the CQ AAP to be sound/unsound, including references to relevant legislation and policies. Please reference legislation and policies for each comment.	Masterplan and emerging Local Plan have been highlighted. For the AAP to pass the test of soundness it should contain proposals/policies which are consistent with the above planning policy framework. This means including proposals/policies which will enhance LCCC's status. The current draft of the AAP fails to achieve this and LCCC therefore objects to the AAP. None of the strategic objectives in section 3.2 include 'the growth and enhancement of LCCC and the strengthening of its role as an international sporting venue'. It is clear from the planning policy context that such an objective is central to the AAP. The failure of the AAP to do so means that the AAP cannot be regarded as having been positively prepared, justified or consistent with national/regional and local planning policy. The strategic vision focuses solely on connectivity and accessibility. The strategic vision should include reference to the role of LCCC as a renowned international sporting venue. In failing to do so, the AAP has not been positively prepared, justified and is inconsistent with national/regional/local policy. The Improved Permeability and Greenspace Plan includes two large areas of open space on the LCCC site. The existing car parking is necessary to LCCC's operation and the loss of such land to open space would have significant detrimental effect on LCCC's future as an international sporting venue. The AAP is therefore unsound in this respect being neither positively prepared, justified or consistent with relevant planning policy. Vision for the Southern Neighbourhood should be amended to refer to enhancement of LCCC as an international sporting venue. Describing the opportunities for the cricket ground as "consolidation" is at odds with the planning policy context referred to above which seeks the promotion of LCCC as an international sporting venue. The opportunities listed in the AAP for the
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N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	6	General comment	CQ1 on page 4. Identification of the former B&Q site as residential in the Land Uses Plan is inconsistent with the vision and previous partnership approach for the AAP to promote the growth and enhancement of LCCC as an international sporting venue. Identification of the B&Q site for residential would utilise land which should be promoted for development consistent with growth of the LCCC. The site was identified for multi storey car park/mixed use as part of freeing up car parking to deliver new leisure facilities. This need to replace outdated training facilities remains. The current planning application/appeal for residential development shows that residential on the site is unsuitable and prejudicial to the future operation of the cricket club. The site should be re-designated for car parking/leisure/ancillary uses to the cricket ground. It would be consistent with enhancing LCCCs status as international sporting venue and also strengthen links with Longford Park. The 'Area Today' section for the Southern Neighbourhood should remove reference to significant opportunity for residential development and emnded to identify opportunities for the former B&Q site are to deliver development that is strengthening of the role of the cricket ground as an international sporting venue comprising carparking/leisure related uses.
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	7	General comment	If the Council wishes to promote a public square, it should achieve that by: utilising the area in fron of the Town Hall including the under used driveway directly in front of the Town Hall; - incorporating the development plot within the Central Neighbourhood which adjoins the junction of Talbot Road and Brian Statham Way which is currently proposed for development; - utilising the existing area of highway within Talbot Road; reconfiguring the junction of Talbot Road and Warwick Road and potentially pedestrianising Warwick Road.
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	8	General comment	The AAP for the Southern Neighbourhood lists as an opportunity 'removing barriers and fencing'. The LCCC being permanently open to the public would prejudice use of its landholding/carparking for its own purposes and would be prejudicial to security of the cricket ground. The reference in the AAP to removing barriers and fencing therefore needs to be amended and qualified. LCCC is happy to explore greater use of its landholding to enhance visitor experience on match days but cannot support proposals which potentially prejudice its future operations.
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415			

N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	9	General comment	The landscape design principles for the Southern Neighbourhood includes podium carparking fronting Great Stone Road which would “allow for carparking to be consolidated and release space for people friendly “community streets” and a central green area for residents”. Insofar as it relates to land within LCCC’s ownership, LCCC objects to this proposal and given its prejudicial impact on the operation of the cricket ground and for this reason the proposal is unsound.
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	10	your answer to question 21, please give details of why you considered that the updated Integrated Assessment process is/is not adequate.	For the same reasons LCCC objects to the AAP and considers it unsound, it follows that the integrated assessment is also inadequate in particular in relation to the assessments undertaken and conclusions reached on IA Objectives 3,4 and 6.
N/A	Lancashire County Cricket Club	414	Hill Dickinson	415	11	Attending the Examination – Soundness. Please note that participation in the Examination will be at the discretion of the appointed Inspector. If you wish to participate in the Examination, please outline why you consider this to be necessary.	It is of critical importance to LCCC as a key stakeholder that the AAP provides a sound and acceptable strategy for the future development of this area. In light of this fact and LCCC’s objections to the AAP, it is important that LCCC is afforded an opportunity to appear at the examination of the AAP
Nicola Carter	N/A	416	N/A	N/A	1	General comment	State of Charlton House, 687 Chester Road is a disgrace and has been repeatedly vandalised. The Council is responsible for the building. Confirm what will be done to clean up and secure the site.
Nicola Carter	N/A	416	N/A	N/A	2	General comment	The number of new flats is not justified and the area already has problems for residents with access and poor quality roads. What will be done to ensure Montague Road is not blocked by parked cars given the excessive number of proposed flats and lack of parking proposed?
Nicola Carter	N/A	416	N/A	N/A	3	General comment	Some very goof plans but very poor on environmental issues. Lack of trees and green areas. In this regard, it has not been 'positively prepared' or consistent with national polict concerning environment and air

Neil Tatton	Resolve106	417	N/A	N/A	<p>12. Please state why you consider the CQ AAP to be sound/unsound, including references to relevant legislation and policies. Please reference legislation and policies for each comment.</p>	<p>adequacy of the viability evidence that underpins Policy CQ11 'Infrastructure and Obligations', including a requirement for 25% affordable housing provision. The Viability Assessment (VA) has not been produced in accordance with National Planning Guidance (NPG) and is unable to demonstrate that the requirements of policy CQ11 are deliverable without prejudicing the realisation of an appropriate Benchmark Land Value. Trafford openly acknowledge that the VA departs from the recommended approach in NPG that requires the establishment of Benchmark Land Value (BLV) based on the principle of Existing Use Value (EUV) plus a 'premium' to incentivise an owner to release land for development. Trafford confirms at paragraph 4.494 that if NPG compliant methodology toward the establishment of BLV is applied Policy CQ11 is not viable. The 'alternative method' included in paragraph 4.95 comprises an assessment of the Residual Value as a proportion of the Net Development Value ('NDV') to which TC conclude that a viable BLV equates to between 4.5% to 6.5% of NDV. Whilst the VA incorporates a 'benchmarking' of land values derived from analysis of different projects in Trafford this does not represent an assessment of BLV in accordance with NPG. Suggested that this be made explicit in order that it may be identified whether or not this is the case. There is no alternate methodology supported by NPG, therefore its provisions must be adhered to in the process of Plan Making. The VA is neither effective or consistent with national policy and by definition policy CQ11 is therefore unsound. The circumstances in relation to the identified deficiencies in the VA are comparable with those considered at the examination of the Old Oak and Park Royal Development Corporation Local Plan. If there is a 25% affordable housing requirement, this may influence the likelihood of land</p>
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						14. You will need to say why this modification(s) will make the CQ AAP sound/strengthen its soundness. It would be helpful if you are able to put forward your suggested revised wording for the relevant policy or text and include all information and evidence necessary to support/justify your suggested change. Please be as precise as possible.	A new VA should be undertaken before the CQ AAP is submitted for examination, utilising the required methodology in NPG to establish an appropriate BLV for plan making purposes. Essential that a revised VA tests the delivery of the CQ AAP incorporating the required S106 contributions on a stand-alone basis. Testing the proportion of affordable housing that may be viably supported should be demonstrably in excess of 10%. This is because Core Strategy Policy L2 provides greater flexibility in allowing negotiation of affordable housing than post 2018 NPPF. Paragraph L.2.1.3 of the TCS remains a suitable basis for consideration of viability matters in connection with planning applications until such time as it is replaced in full with a NPPF compliant Local Plan
Neil Tatton	Resolve106	417	N/A	N/A	2		
						15. If your representation is proposing a modification(s), do you consider it necessary to participate in the Examination in Public?	
Neil Tatton	Resolve106	417	N/A	N/A	3		Would be prepared to participate in the Examination in Public if this would be of assistance.
Rupert Ward	N/A	418	N/A	N/A	1	General comment	Generally a very good plan. Traffic flow issues will be key to success.
Rupert Ward	N/A	418	N/A	N/A	2	General comment	Supportive of policy to guide traffic around not through areas, but if this is to work there are key things to sort.
							Lot of rush hour traffic flows Trafford Wharf, White City Roundabout, White City Way, Talbot Road, Seymour Grove i.e. M602 to Chorlton. This can be diverted via Chester Road. Sort traffic lights and flow at White City Roundabout. Optimise prioritisation of Chester Road, Stretford Road, Seymour Grove. The traffic heading onto Bridgewater Way from Trafford Road and Wharfside Wat blocks traffic travelling towards Chorlton via White City Way and travelling the other way the lights from Talbot Road onto White City Way do not optimise traffic flow. A multi-storey on the corner of the police station will cause more problems if traffic backs up onto the roundabout.
Rupert Ward	N/A	418	N/A	N/A	3	General comment	

Rupert Ward	N/A	418	N/A	N/A	4	General comment	Traffic flow on Great Stone Road is terrible. Leisure Centre traffic from the quadrant queues to go straight on because there is a queue of traffic that can't turn left onto Talbot Road because of traffic queues on Chester Road heading towards Stretford and the motorway. Look again at reprioritising flow here.
Rupert Ward	N/A	418	N/A	N/A	5	General comment	Welcome refurbished Leisure Centre but multi-storey access will be hassle for families with young children. Provide more secure and sheltered bike parking. Think where NHS lorries should go. Make sure that leisure centre facilities are easy to access for those with families, the elderly, disabled etc. and carefully consider the role of parking and other ways of accessing these facilities to minimise barriers to use. Cycling from the Quadrant to the Leisure Centre is currently dangerous.
Rupert Ward	N/A	418	N/A	N/A	6	General comment	Think about how park and ride could help reduce traffic in the area. Trams should accommodate bicycles.
Rupert Ward	N/A	418	N/A	N/A	7	General comment	Pedestrianizing' from the Quays to LCC is an excellent idea.
Rupert Ward	N/A	418	N/A	N/A	8	General comment	More other outdoor sports facilities would be great
Rupert Ward	N/A	418	N/A	N/A	9	General comment	Trafford Bar needs a face lift. On match day there are no places to meet up. UA92, the college and residents can make this much better, so looking forward to seeing this developed.

Pete Whittingham	Savills	419	N/A	N/A	1	General comment	<p>The site shown on enclosed plan is large plot in a prominent location on Talbot Road. Site is currently a vacant office building and car parking, the building extends to almost 100,000 sq ft within a site of 2.2 ha. Site is 2km from Manchester City Cenrew, within easy walking distance of cricket and football stadiums. White City Retail Park and Tesco Extra provide shops and services within walking distance. Old Trafford Metrolink stop is nearby. Frequent bus services. Site is sustainably located and suitable for redevelopment. The office building within the site is not considered suitable for conversion. The UA92 site was recently granted planning permission on 25 September 2020 for residential and mixed use. This is indicative of the emerging context of the site. The majority of the site could be redeveloped for a medium to high density residential scheme. This would provide much needed new housing. Site is not allocated for any specific purpose. The site falls within the Old Trafford Priority Regeneration Area (Policy L3). The policy states that housing led redevelopment will be promoted. The site is a sustainably located brownfield site which offers a significant regeneration opportunity. Given the sensitivity around Green Belt release through the GMSF the Council should be seeking to concentrate high density development on sustainable urban brownfield sites wherever possible. Trafford Council acknowledge that their current housing land supply figure is 2.4 years¹. Trafford's housing supply is therefore less than 50% of the Government's target of five years. In Trafford, the HDT has shown an under delivery of housing over the last three years. The effect of this is the presumption in favour of sustainable development. The overall context in Trafford lends favourably to supporting the development of land in sustainable locations. Any specific housing targets set out in the Core</p>
Pete Whittingham	Savills	419	N/A	N/A	2	General comment	<p>Supportive of general objective to provide new housing. The 4,000 should not be seen as a cap but as a broad target which could be exceeded. The site straddles the Central and Eastern Neighbourhoods. The AAP shows new buildings on the existing car park in the Eastern Neighbourhood. Agree with the site being identified as an opportunity. But recommend that the building is also identified for redevelopment to provide flexibility within the AAP for future redevelopment proposals.</p>

Pete Whittingham	Savills	419	N/A	N/A	3	General comment	Section 2.5 of the AAP identifies existing tall buildings within the AAP boundary. Other tall buildings in the AAP areas include Alexander House off Talbot Road and the newly built Insignia scheme at 86 Talbot Road off Warwick Road. There are also a number of large buildings and structures in terms of scale and massing in the area, such Old Trafford Football Stadium and Old Trafford Cricket Ground. The City Centre's commercial and residential boundaries are expanding outwards into Trafford. The change has seen a number of new high density tall residential buildings being granted planning permission and built in recent years. This change is reflected in the AAP which identifies sites as being suitable for high density development and tall buildings of up-to 20 storeys in certain locations. This provides a useful guide on the development context in the immediate vicinity of the site and demonstrates that there is a precedent for tall buildings in the area. Again, 20 storeys should not be seen as cap but indicative of the general height that could be achieved. By allowing some flexibility there would be opportunity to assess the impact of tall buildings on the skyline. Support the general objective of tall buildings. Buildings of 20 storeys would also be appropriate at the site and this should be reflected in the AAP. Policies within the AAP should not place unnecessary restrictions on building heights. Any parameters within the AAP should be used to guide development proposals and not be enforced stringently. Flexibility should be incorporated into the AAP to allow the appropriateness of scale and massing to be assessed on a site by site basis.
Peter Baugh	Trafford Arts Association	420	N/A	N/A	1	General comment	Providing input to contribute to the feneration of much needed community facilities for future generations. There are serious short coming in the current facilities within Trafford. Trafford Arts Association is an umbrella organisation for the arts, musical and creative activities within Trafford.
Peter Baugh	Trafford Arts Association	420	N/A	N/A	2	General comment	Whole hearded agree with statement in Core Strategy Policy R6 Culture and Tourism, section 26.1.
Peter Baugh	Trafford Arts Association	420	N/A	N/A	3	General comment	The plan makes great play of the 19th century developments in the area. But, despite the occasional inclusion of the word "culture", it fails to include anything recognised as a cultural facility such as a concert hall, for future generations.

Peter Baugh	Trafford Arts Association	420	N/A	N/A	4	General comment	The inclusion in the AAP of a multi-purpose performing arts space comprising a concert hall, exhibition space and rooms for use of musicians, artists, and craft workers would be an asset offering concerts, musical theatre, plays, photographic and art and craft exhibitions. This building, if situated in a pedestrianised area along with shops and cafes, would play a large part of any special community day or local or Trafford festival.
Peter Baugh	Trafford Arts Association	420	N/A	N/A	5	General comment	Great wish for Trafford to help enrich community buildings. Consideration should also be given to bringing down the cost of hire of Trafford's public buildings including schools, to support not-for-profit community groups.
John Cookson	Transport for Greater Manchester	421	N/A	N/A	1	General comment	The draft of the AAP appears broadly similar to the previous draft and therefore Transport for Greater Manchester's (TfGM) response to the previous draft (attached) still largely applies. Though it is noted that some comments no longer apply as they have been addressed
John Cookson	Transport for Greater Manchester	421	N/A	N/A	2	General comment	The AAP is broadly coherent with TfGM's 2040 Strategy (which is now referenced explicitly in this draft).
John Cookson	Transport for Greater Manchester	421	N/A	N/A	3	General comment	TfGM strongly supports the approach to urban design and to density and walkability of neighbourhoods
John Cookson	Transport for Greater Manchester	421	N/A	N/A	4	General comment	TfGM supports the approach to walking and cycling, which is coherent with TfGM's Streets for All approach and with the Bee Network – it may be worth referencing these two documents explicitly in the AAP
John Cookson	Transport for Greater Manchester	421	N/A	N/A	5	General comment	TfGM supports the approach to walking and cycling, which is coherent with TfGM's Streets for All approach and with the Bee Network – it may be worth referencing these two documents explicitly in the AAP.
John Cookson	Transport for Greater Manchester	421	N/A	N/A	6	General comment	There is scope to say more about bus in the AAP.
Will York	N/A	422	N/A	N/A	1	General comment	Support the plan in general and it meets the NPPF tests of soundness but there are opportunities for its soundness to be improved.
Will York	N/A	422	N/A	N/A	2	General comment	Plan does not definitely say that segregated cycle ways will be kept/built. State categorically that Warwick Road and all the yellow routes on the map in section 2.4.1 must segregate cyclists from cars and pedestrians and prioritise cyclists at junctions to ensure development meets or exceeds national standards (LTN 1/20) and national policy ("Gear Change" Cycling and Walking Plan for England).

Will York	N/A	422	N/A	N/A	3	General comment	Sections 4.3.1 and 4.3.10 of the Transport Assessment states that cycle infrastructure is 'excellent'. Existing cycling lanes along Talbot Road are poor or at best adequate. If local infrastructure is not widespread, does not exceed standards set out in LTN1/20, and does not embody the national policy set out in the Government's "Gear Change" Cycling and Walking Plan for England, then it cannot be considered 'excellent'.
Will York	N/A	422	N/A	N/A	4	General comment	Section 8.4.2 of Transport Assessment sets pathetic targets for modal shift. The target of 10% does not align with the decarbonisation goals of Trafford Council, Greater Manchester, or the Government.
Will York	N/A	422	N/A	N/A	5	General comment	Section 4.5.1 of the Transport Assessment refers to 'shared off-road pedestrian/cycle provision' but this may not align with the Government's "Gear Change" Cycling and Walking Plan for England. Shared use pedestrian and cycle routes generally prove to be at best annoying, at worst dangerous, for both cyclists and pedestrians. When cyclists inevitably choose to use the road instead, this aggravates motorists.
Denice Bowler	N/A	578	N/A	N/A	1	6. Is the CQ AAP positively prepared?	Yes
Denice Bowler	N/A	578	N/A	N/A	2	7. Is the CQ AAP justified?	Yes
Denice Bowler	N/A	578	N/A	N/A	3	8. Is the CQ AAP effective?	No
Denice Bowler	N/A	578	N/A	N/A	4	9. Is the CQ AAP consistent with national policy?	No
Denice Bowler	N/A	578	N/A	N/A	5	10. Thinking about the tests of soundness, do you consider the CQ AAP to be sound?	Unsound
Denice Bowler	N/A	578	N/A	N/A	6	11. Based on the answer to the tests of soundness, please state clearly which page, policy, paragraph, plan or other content you are referring to in forming this view.	CQ AAP Content 1: NPPF 91 and 92 - there is little open space being created and it does not meet the needs of the existing population. More green space is required. Area will be over developed. CQ AAP CQ AAP

Denice Bowler	N/A	578	N/A	N/A	7	11. Based on the answer to the tests of soundness, please state clearly which page, policy, paragraph, plan or other content you are referring to in forming this view.	Content 2: There is not any playgrounds or recreational space provided. The pandemic has shown the needs for more accessible open spaces.
Denice Bowler	N/A	578	N/A	N/A	8	11. Based on the answer to the tests of soundness, please state clearly which page, policy, paragraph, plan or other content you are referring to in forming this view.	Content 3: All policy has been written pre pandemic and therefore is outdated. It does not consider shift in working from home that is reducing the need for office space, the increasing need for wider footways/cycleways or the need to encourage walking and cycling for transport and recreation.
Denice Bowler	N/A	578	N/A	N/A	9	12 Please state why you consider the CQ AAP to be sound/unsound, including references to relevant legislation and policies. Please reference legislation and policies for each comment.	Explanation regarding Content 1: NPPF needs to be updated to reflect cultural change, reduced need to work in offices and greater demand for local open space and play areas. Not more need for leisure centres because they can be closed when waves of infection occur.
Denice Bowler	N/A	578	N/A	N/A	10	13. Are you proposing modification(s) to make the CQ AAP sound or to strengthen its soundness? Yes	Yes

Denice Bowler	N/A	578	N/A	N/A	11	<p>14. You will need to say why this modification(s) will make the CQ AAP sound/strengthen its soundness. It would be helpful if you are able to put forward your suggested revised wording for the relevant policy or text and include all information and evidence necessary to support/justify your suggested change. Please be as precise as possible.</p>	<p>Modification to Content 1: All private office blocks to provide public realm space which adds to the local character, open planned and accessible integrated with wellbeing routes where applicable. Modification to Modification to</p>
Denice Bowler	N/A	578	N/A	N/A	16	<p>15. If your representation is proposing a modification(s), do you consider it necessary to participate in the Examination in Public?</p>	<p>No</p>

Denice Bowler	N/A	578	N/A	N/A	17	16. Reason for Attending the Examination – Soundness. Please note that participation in the Examination will be at the discretion of the appointed Inspector. If you wish to participate in the Examination, please outline why you consider this to be necessary.	None
Denice Bowler	N/A	578	N/A	N/A	18	17. Do you consider the CQ AAP to have met/not met the requirement of the Duty to Cooperate in accordance with Section 110 of the Localism Act 2011 and Section 33A of the Planning and Compulsory Purchase Act 2004?	Met
Denice Bowler	N/A	578	N/A	N/A	19	19. Independent Examination – Duty to Cooperate. In regards to the Duty to Cooperate, do you consider it necessary to participate in the Examination in Public?	No

Denice Bowler	N/A	578	N/A	N/A	20	21. With reference to the updates to the Integrated Assessment process, do you consider the assessment undertaken to be adequate?	Yes
Denice Bowler	N/A	578	N/A	N/A	12	14. You will need to say why this modification(s) will make the CQ AAP sound/strengthen its soundness. It would be helpful if you are able to put forward your suggested revised wording for the relevant policy or text and include all information and evidence necessary to support/justify your suggested change. Please be as precise as possible.	Modification to Content 2: Creation of public play areas within the quadrant area.

Denice Bowler	N/A	578	N/A	N/A	13	<p>14. You will need to say why this modification(s) will make the CQ AAP sound/strengthen its soundness. It would be helpful if you are able to put forward your suggested revised wording for the relevant policy or text and include all information and evidence necessary to support/justify your suggested change. Please be as precise as possible.</p> <p>Modification to Content 3: Improving accessibility along well being route for pedestrians and cyclists by prioritising footways & cycleways.</p>
Denice Bowler	N/A	578	N/A	N/A	14	<p>14. You will need to say why this modification(s) will make the CQ AAP sound/strengthen its soundness. It would be helpful if you are able to put forward your suggested revised wording for the relevant policy or text and include all information and evidence necessary to support/justify your suggested change. Please be as precise as possible.</p> <p>Modification to Content 4: Improve the wellbeing route by increasing pedestrian cyclists crossing points including at the junction leading to White City to prioritise crossing for pedestrian and cyclists (outside nursery building).</p>

						14. You will need to say why this modification(s) will make the CQ AAP sound/strengthen its soundness. It would be helpful if you are able to put forward your suggested revised wording for the relevant policy or text and include all information and evidence necessary to support/justify your suggested change. Please be as precise as possible.	
Denice Bowler	N/A	578	N/A	N/A	15		Modification to Content 5: Reduce traffic flow.
Martin Smith	N/A	579	N/A	N/A	1	6. Is the CQ AAP positively prepared?	Yes
Martin Smith	N/A	579	N/A	N/A	2	7. Is the CQ AAP justified?	Yes
Martin Smith	N/A	579	N/A	N/A	3	8. Is the CQ AAP effective?	Yes
Martin Smith	N/A	579	N/A	N/A	4	9. Is the CQ AAP consistent with national policy?	Yes
Martin Smith	N/A	579	N/A	N/A	5	10. Thinking about the tests of soundness, do you consider the CQ AAP to be sound?	Sound
Martin Smith	N/A	579	N/A	N/A	6	13 Are you proposing modification(s) to make the CQ AAP sound or to strengthen its soundness?	No

Martin Smith	N/A	579	N/A	N/A	7	15 If your representation is proposing a modification(s), do you consider it necessary to participate in the Examination in Public?	No
Martin Smith	N/A	579	N/A	N/A	8	23 Do you have any further comments regarding the CQ AAP	Do not mess with the A56. Capacity on this road need to be increased.
Martin Smith	N/A	579	N/A	N/A	9	24 Do you have any further comments regarding the CQ AAP	Do not remove White City retail park, it is so useful.
Neil Dymond-Green	N/A	580	N/A	N/A	1	6. Is the CQ AAP positively prepared?	Yes
Neil Dymond-Green	N/A	580	N/A	N/A	2	7. Is the CQ AAP justified?	No
Neil Dymond-Green	N/A	580	N/A	N/A	3	10. Thinking about the tests of soundness, do you consider the CQ AAP to be sound?	Unsound
Neil Dymond-Green	N/A	580	N/A	N/A	4	23. Do you have any further comments regarding the CQ AAP	There is a lot to celerate about the plans for the Civic Quarter
Neil Dymond-Green	N/A	580	N/A	N/A	5	23. Do you have any further comments regarding the CQ AAP	Do not understand why the retail park is being removed, as it is a positive contribution to the wider area and there are few alternatives anywhere nearby for many of the businesses there.

Viability Consultation Responses							
Matthew Hard	WSP	55	N/A	N/A	1		However as the work that has been done to date by continuum has taken account of the FVA submitted with the planning application associated with the proposed redevelopment of the former B&Q, we have nothing further to provide.
Gemma Gaskell	United Utilities	260	N/A	N/A	1	General comment	This is not something that I feel we can input into, however I would be grateful to receive any feedback from the event
N/A	Derwent Estates	283	Mark Aylward	284	1	General comment	Viability Input Sheet gives the opportunity to offer alternative inputs for various costs and values as well as other key inputs. The cover document seeks that any alternative inputs we might offer should be justified and corroborated. Derwent Estates' response to the last consultation exercise was to seek clarification that the inputs which had been used to inform the AAP had done this, rather than to seek to offer a whole different set of numbers which would simply complicate matters for the Inspector at a future Examination
	Derwent Estates	283	Mark Aylward	284	2	General comment	Blanket approaches to EUV might not be helpful i.e. the existing use values of a pretty much fully let and modernised White City Retail Park must be very different to the cleared GMP site. There are sites in different active commercial and residential use as well as development sites which have an eye to future value so that needs to be recognised. It could be feasible for that analysis to be undertaken on a parcel by parcel basis, informed by relevant analysis.
	Derwent Estates	283	Mark Aylward	284	3	General comment	The emerging Plan is seeking some additional obligations and it is unclear to us that any consequences have been built into the viability analysis. Some of these effects are to a degree unknown because the Plan is directing volume apartment development at what is essentially a new marketplace.
	Derwent Estates	283	Mark Aylward	284	4	General comment	Multistorey Car Parks (MSCP) would involve a major capital cost that would presumably be incurred early in the development cycle. Return on that investment would only be secured if occupiers were found quickly and used the facilities on a consistent basis. If an MSCP was to be located at White City RP, it would serve the needs of adjoining parcels. If other development is relying upon an MSCP on third party land, how are the viability implications of that (for either party) taken into account? If it is essentially ignored, this appears to place a greater risk on the developer which is being encouraged to provide an MSCP on their land to assist others.

	Derwent Estates	283	Mark Aylward	284	5	General comment	Viability Assessment (January 2021) takes a largely generic approach. The purpose of this response is to highlight some specific instances where there are abnormal costs that require consideration, as well as some more generic matters which will require further analysis
	Derwent Estates	283	Mark Aylward	284	6	General comment	There are a number of additional obligations by the Local Plan and the national policy agenda which have not been incorporated into the viability analysis. This places some doubt in terms of the realism of the "roof tax" or affordable housing provision
	Derwent Estates	283	Mark Aylward	284	7	General comment	These additional obligations will adversely impact upon scheme viability but not in a position to precisely quantify cost implications. It is important that these points are highlighted so that Continuum have an opportunity to consider them prior to the Examination
	Derwent Estates	283	Mark Aylward	284	8	General comment	Flag emerging policies from Reg 18 Local Plan which pertains to residential development and does not align with the Viability Statement.
	Derwent Estates	283	Mark Aylward	284	9	General comment	Policy HN1.5 sets out requirements in terms of type and tenure that are inapplicable to apartments in the Civic Quarter in the context of for most of these units to provide at least 3 bedrooms. The vast majority of apartment accommodation which can be delivered at the Civic Quarter will be either 1 or 2 bedroomed. To place a notional requirement for 50% of units to have three bedrooms will fatally prejudice deliverability. Local Plan policy needs to be adjusted, but otherwise there will be a requirement to adjust the scheme proposed by the AAP and its Viability Assessment to reflect this mix dominated by larger family apartments which do not appear to reflect market requirements
	Derwent Estates	283	Mark Aylward	284	10	General comment	Policy IP1 target date for carbon neutrality should be 2038. Clearly if that obligation is front-loaded then this will have viability implications which need to be resolved line-by-line
	Derwent Estates	283	Mark Aylward	284	11	General comment	IP4.7 and (IP4.8-IP4.10) will result in additional costs to the developer. The intent is positive, but the viability implications do need to be appraised using a "policy on" approach both for the Local Plan but also for the AAP area
	Derwent Estates	283	Mark Aylward	284	12	General comment	Policies H02 and HN2 40% affordable provision for apartments boroughwide is in conflict with the AAP Viability Assessment which suggests 25% affordable housing provision. Much more effective to identify a target figure that was actually achievable based upon the
	Derwent Estates	283	Mark Aylward	284	13	General comment	HN5 on self-build requirements should be reqorded so that it does not apply to apartment development

	Derwent Estates	283	Mark Aylward	284	14	General comment	ST3.13 support for a new rail station at White City- this should be omitted or otherwise clarified that this is not an express Plan objective. Suggest that reference to a future train station be omitted unless it is shown to be deliverable within the Plan period. If it were to be retained, that will require considerable additional work to the AAP and it is unclear that there is any merit in doing so.
	Derwent Estates	283	Mark Aylward	284	15	General comment	Policy ST6 support for electric vehicle charging points is not quantified. If this were to later translate into a quantitative requirement for development management proposals this will have viability implications and this will need to form part of a robust “policy on” assessment to ensure that it would not impact on the delivery of viable development in the District across the Plan period.
	Derwent Estates	283	Mark Aylward	284	16	General comment	Unclear Open Space policies can be straightforwardly applied on a plot-by-plot basis within the AAP area. For the Civic Quarter AAP open space requirements should be addressed at the AAP level and that suitable provision is provided either on-site or off-site and that the viability work needs to consider the implications of both scenarios for any applicable “roof tax” projections.
	Derwent Estates	283	Mark Aylward	284	17	General comment	Initial evidence from other local planning authorities is that the implementation of First Homes will require detailed consideration by the marketplace and the viability implications on deliverability needs to be properly considered. We would encourage Continuum to consider the extent to which First Homes can be delivered here and any likely viability implications arising both in terms of scheme finances and to ensure yield to achieve the anticipated Local Plan trajectory.
	Derwent Estates	283	Mark Aylward	284	18	General comment	For Biodiversity Net Gain (BNG), AAP is promoting development in highly urbanised plot that will demand higher density. The base biodiversity position is likely to be low and any substantive net gain is unlikely to be met on-site on a plot-by-plot basis within the AAP area. AAP may need to clarify that BNG requirements are met on a strategic basis and that this in essence forms a component of “infrastructure”. Any ambition for Biodiversity Net Gain should be addressed at the AAP level and it would be helpful if it explicitly recognised that the majority of any suitable provision is most likely to be provided outside the AAP area. The cost implications of this are not known, but if BNG is to be adopted then the viability work will need to consider the implications for any applicable “roof

	Derwent Estates	283	Mark Aylward	284	19	General comment	<p>It is likely that residential-led redevelopment at White City envisaged by the AAP would be implemented on a phased basis and would need to ensure adequate parking for retained retail uses as well as the new residential-led development. The ability to “release“ land at White City for parking is overplayed especially in the prism of the likely phased delivery of new homes at the White City site. Whilst there is potential that an MSCP could be delivered in an earlier phase of development at White City, this would represent a considerable early capital investment and that any market return would be entirely reliant upon early completion and occupation of residential development that would utilise those facilities. MSCP would not be needed by Derwent until it committed to a considerable component of residential development. If the anticipated scale of parking at White City was predicated in part upon the parking requirements from new development on third party land, then any early capital investment by Derwent (or others) is entirely at risk of their delayed delivery and need to use and pay for that parking. It will be important to ensure that the viability implications of such an endeavour has been properly considered so that it does not unfairly impact upon one developer (i.e. Derwent) both in terms of cashflow but also as to how it could constrain layout and other commercial opportunities. As per recent discussions, this should be considered as part of a broader equalisation approach that is central to the inputs to the viability framework</p>
	Derwent Estates	283	Mark Aylward	284	20	General comment	<p>Agree that there is merit in a consistent approach to identifying benchmarked land values, the consideration of various sites within the AAP area do highlight that the existing valuations of the land parcels show marked disparity. It cannot be reasonable to assume that the “EUV plus“assessment for a successful retail park will be the same as other parcels within the AAP area. Viability Assessment should seek to review development costs on a site-by- site basis to understand whether the assessment of “EUV plus“ or any abnormal costs warrant a move away from the generic typical inputs because this would ensure that the need for viability assessment is not unnecessarily “baked in“ to the policy. Failing that, the policy should ideally be rewritten to ensure that it allows for viability testing and would not prevent otherwise acceptable and positive development from being implemented.</p>

	Derwent Estates	283	Mark Aylward	284	21	General comment	Any requirement for early delivery of an MSCP at White City Retail Park will represent an abnormal development cost. If there is a Council ambition for early MSCP delivery then this needs to be managed by an equalisation approach. An example of an abnormal cost in the AAP area is a legacy railway tunnel impacting upon the development costs. Likely that the presence of this tunnel will require an atypical construction approach that may have higher build costs than are anticipated by Continuum's analysis of generic construction inputs. The presence of the legacy tunnel is likely to have implications for yield. The draft AAP does clarify an intent to consider the use of s226 powers to ensure delivery. The s226 process can be used to acquire land but also to simplify title. In this latter context, this could catalyse delivery and maximise yield on parcels (such as 39 Talbot Rd and the GMP site) which are constrained by easements and covenants. This would represent a positive use of s226 powers to accelerate Plan-led development that would positively
	Derwent Estates	283	Mark Aylward	284	22	General comment	The AAP means any future retail use would meet localised needs falling within the F2 Use Class. This means a redeveloped White City Retail Park would not even allow a store akin to a Tesco Express. Such a limited retail offer would simply fail to meet the shopping needs of new residents in the AAP area and push residents towards car-borne choices further afield. It would pressure further out-of-centre retail development to replace the existing stores that is also dependent upon a risk profile. This policy intent needs to be fundamentally reconsidered. It may in practice be preferable to retain an offer that can genuinely meet shopping needs, but this will inevitably impact upon residential yield and that will have viability implications that will need to be considered.
	Derwent Estates	283	Mark Aylward	284	23	General comment	Derwent is supportive in principle of the proposed redevelopment within the AAP area including White City Retail Park. Derwent supports the ambition but is clear that any full redevelopment decision requires considerable market testing and that there is potential that such redevelopment would need to be phased. This will need to ensure that the retained retail uses can be effectively serviced and accessed by customers. This is absolutely crucial to our support of these proposals.
Neil Tatton	Resolve106	417	N/A	N/A	1	General comment	I will be unable to attend